

CITY OF CANTON, OHIO

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)



Municipal Separate Storm Sewer System (MS4) Operator: City of Canton, Ohio
218 Cleveland Ave. SW - 8th Floor
Canton, Ohio 44702
Phone: 330-438-4307
Fax: 330-489-3282
Attention: Director of Public Service

SWMP Primary Contact: Christopher D. Barnes, PE, CPESC, CPSWQ
Assistant City Engineer
Engineering Department - Civil Division
2436 30th St NE - Building A
Canton, Ohio 44705
Phone (main): 330-489-3381
Phone (direct): 330-438-6908
Fax: 330-489-3337
E-mail: chris.barnes@cantonohio.gov

Ohio EPA NPDES General Permit: OHQ000002
Storm Water Associated with: Small MS4 NOI

Issuance Date: 1/30/2009

Effective Date: 1/30/2009

Expiration Date: 1/29/2014

City of Canton General Permit Approval Date: 6/4/2009

Ohio EPA Facility Permit Number: 3GQ00072*BG

Annual Reports Due: April 1st
Annual Report Period: January - December of previous year

Cover Revised: 1/4/2010

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)															
Table of Organization (per Permit Part III.A.1.d.)															
Summary of Departmental Involvement in SWMP Minimum Control Measures and Associated Responsible Persons															
The City of Canton's SWMP is comprised of six Minimum Control Measures (MCMs) as required by Ohio EPA NPDES General Permit No. OHQ000002. Several Best Management Practices (BMPs) are used to satisfy requirements of each of the six MCMs. The following is a list of responsible persons (column [5]) that are involved in the implementation of BMPs in the City's SWMP. To find the BMPs for a specific person, use column [6] to identify the MCMs in which involvement is indicated by a "Y". Then find the respective "MCM#_ Overview" and "MCM#_ BMPs" sheets by looking in the lower left corner of the SWMP pages. Each "Responsible Person" should familiarize themselves with the appropriate "MCM#_ Overview" sheets. On the appropriate "MCM#_ BMPs" sheets, scan down column #8 or #9 to find the respective responsible person. Then read all of the information within that row for the corresponding BMP to identify specific responsibilities, expectations, etc. The number in parentheses represents the number of BMPs within each MCM that the responsible person is has direct involvement.														Revised	
[1] Entity	[2] Overall Authority		[3] Department	[4] Division	[5] Responsible Person				[6] Directly involved in MCM implementation? (# of BMPs)						3/10/2010
					Position	Name	Phone #	Email	MCM#1	MCM#2	MCM#3	MCM#4	MCM#5	MCM#6	
City of Canton	Board of Health		Health	Environmental Health (EH)	EH Director	Mark Adams	330-438-4641	madams@cantonhealth.org	Y (1)	N	Y (5)	N	N	N	3/10/2010
	Judges		Judges	Community Service	Community Service Director	Lindsay Trent	330-438-4214	lindsay.trent@cantonohio.gov	N	Y (1)	N	N	N	N	3/10/2010
	Park Commission		Park		Director	Doug Perry	330-438-6981	doug.perry@cantonohio.gov	Y (1)	Y (1)	N	N	Y (1)	Y (4)	3/10/2010
	Joint Recreation District		Recreation		Director	Nadine Sawaya	330-438-4894	nadine@cantonrecreation.com	Y (1)	N	N	N	N	Y (2)	3/10/2010
	Mayor	(Mayor)			Mayor	William J. Healy II	330-438-4300	healy@cantonohio.gov	N	N	N	N	N	N	1/21/2010
					Management Assistant	Derek Gordon	330-438-4305	derek.gordon@cantonohio.gov	N	Y (1)	N	N	N	N	3/10/2010
		Safety Director			Safety Director	Tom Ream	330-438-4312	thomas.ream@cantonohio.gov	N	N	N	N	N	N	1/21/2010
			Building	Zoning	Zoning Inspector	Darla Hinderer	330-438-4726	darla.hinderer@cantonohio.gov	N	N	N	N	Y (2)	N	3/10/2010
			Fire		Fire Chief	John Whitlach	330-438-4540	john.whitlach@cantonohio.gov	Y (1)	N	Y (1)	N	N	Y (6)	3/10/2010
			Police	Impound	Lieutenant	John Rubis	330-438-4485	john.rubis@cantonohio.gov	Y (1)	N	N	N	N	Y (2)	3/10/2010
		Service Director			Service Director	Warren Price	330-438-4309	warren.price@cantonohio.gov	N	N	N	N	N	Y (1)	3/10/2010
			Building Maintenance		Supervisor	C. Daniel Millsap	330-438-4191	daniel.millsap@cantonohio.gov	Y (1)	N	N	N	N	Y (2)	3/29/2010
			Civic Center		Manager	Geoff Tompkins	330-438-6179	geoff.tompkins@cantonohio.gov	Y (1)	N	N	N	N	Y (2)	3/10/2010
			Collection Systems (Sewer)		Superintendent	Jim DiMarzio	330-438-6941	james.dimarzio@cantonohio.gov	Y (1)	N	Y (2)	N	N	Y (5)	3/10/2010
			Development		Director	Robert Torres	330-438-4123	robert.torres@cantonohio.gov	N	Y (1)	N	N	Y (2)	N	3/10/2010
			Division of Motor Vehicles (DMV)		Superintendent	Don Heath	330-438-6959	don.heath@cantonohio.gov	Y (1)	N	N	N	N	Y (7)	3/10/2010
			Engineering		City Engineer	Dan Moeglin	330-438-6903	dan.moeglin@cantonohio.gov	Y (1)	N	Y (8)	Y (2)	Y (6)	Y (2)	3/10/2010
			Engineering	Civil	Assistant City Engineer	Chris Barnes	330-438-6908	chris.barnes@cantonohio.gov	Y (2)	N	Y (2)	N	N	N	3/10/2010
			Engineering	Traffic	Assistant City Engineer	Nick Loukas	330-438-6920	nick.loukas@cantonohio.gov	N	N	N	N	N	Y (3)	3/10/2010
			Sanitation		Superintendent	Byron Carson	330-438-6977	byron.carson@cantonohio.gov	Y (2)	N	N	N	N	Y (1)	3/10/2010
			Street		Superintendent	Kevin Monroe	330-438-6961	kevin.monroe@cantonohio.gov	Y (1)	Y (1)	N	N	N	Y (12)	3/10/2010
			Water		Superintendent	Tyler Converse	330-438-6574	tyler.converse@cantonohio.gov	Y (1)	N	N	N	N	Y (5)	3/10/2010
			Water Reclamation Facility (WRF)		Superintendent	Tracy Mills	330-438-4803	tracy.mills@cantonohio.gov	Y (1)	N	N	N	N	Y (5)	3/10/2010
	Stark County			Soil & Water Conservation District (SWCD)		Urban Resource Coordinator	Julie Berbari	330-830-7700	julie.berbari@starkswcd.org	Y (1)	N	N	Y (3)	Y (3)	N
Any questions regarding the City of Canton's SWMP should be directed to the SWMP Primary Contact: Christopher D. Barnes, PE, CPESC, CPSWQ Assistant City Engineer Engineering Department - Civil Division 2436 30th St NE - Building A Canton, Ohio 44705 Phone (main): 330-489-3381 Phone (direct): 330-438-6908 Fax: 330-489-3337 E-mail: chris.barnes@cantonohio.gov						SWMP's Six Minimum Control Measures: MCM#1: Public Education and Outreach on Storm Water Impacts MCM#2: Public Involvement/Participation MCM#3: Illicit Discharge Detection and Elimination MCM#4: Construction Site Storm Water Runoff Control MCM#5: Post-Construction Storm Water Management in New Development and Redevelopment MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations							3/10/2010		

CITY OF CANTON, OHIO: NPDES PHASE II STORMWATER MANAGEMENT PROGRAM (SWMP)			Revised
(Permit Part III.B.1.) Minimum Control Measure (MCM) #1: Public Education and Outreach on Storm Water Impacts			
MCM Permit Requirement(s)			
Part III.B.1.a.	[City of Canton] shall implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.		
Decision Process (Rationale Statement) for Development of Storm Water Public Education and Outreach Program			----
Part III.B.1.b.	[City of Canton] shall document [its] decision process for the development of a storm water public education and outreach program. [City of Canton's] rationale statement shall address both [its] overall public education program and the individual BMPs, measurable goals, and responsible persons for [its] program.		
Response:	The City of Canton supports EPA's assessment that an informed and knowledgeable community is crucial to the success of a SWMP since it helps ensure the following: (1) "Greater support" for the program as the public gains a greater understanding of the reasons why it is necessary and important; and (2) "Greater compliance" with the program as the public becomes aware of the personal responsibilities expected of them and others in the community, including the individual actions they can take to protect or improve the quality of area waters. See USEPA's Stormwater Phase II Final Rule Fact Sheet Series at http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm for further information on the NPDES Phase II Small MS4 Storm Water Program and the associated Minimum Control Measures. The City of Canton is to implement the BMPs described below as part of its Storm Water Public Education Program. The identified BMPs are those that the City believes are needed to meet permit requirements and/or expectations. See "Public Education and Outreach on Stormwater Impacts" on USEPA's National Menu of Stormwater Best Management Practices at http://cfpub.epa.gov/npdes/stormwater/menuofbmps/ for further BMP guidance and information.		1/21/2010
Part III.B.1.b.	The rationale statement shall include the following information, at a minimum:		----
Part III.B.1.b.i.	How [City of Canton] plans to inform individuals and households about the steps they can take to reduce storm water pollution.		
Response:	Publications, flyers, the City's website, and other mechanisms (as they become available and feasible to utilize) are to be used to inform individuals and households about the steps that can be taken to reduce storm water pollution. There are other means within the City, such as eco-sensitive messages on storm		1/21/2010
Part III.B.1.b.ii.	How [City of Canton] plans to inform individuals and groups on how to become involved in the storm water program (with activities such as local stream and beach restoration activities).		----
Response:	Publications, flyers, the City's website, and other mechanisms (as they become available and feasible to utilize) are to be used to inform individuals and groups on how to become involved in the storm water program (with activities such as local stream cleanups, meetings, etc.). See BMPs below for further details.		1/21/2010
Part III.B.1.b.iii.	Who are the target audiences for [City of Canton's] education program who are likely to have significant storm water impacts (including commercial, industrial, and institutional entities) and why those target audiences were selected.		----
Response:	The City of Canton is mostly comprised of residential, commercial, industrial, and institutional entities, and as such, these are likely to have significant storm water impacts and therefore are the intended target audiences for the Public Education and Outreach Program. However, each BMP listed below lists the		1/21/2010
Part III.B.1.b.iv.	What are the target pollutant sources [City of Canton's] public education program is designed to address.		----
Response:	The City of Canton is located partly or completely within the "East Branch Nimishillen Creek", "West Branch Nimishillen Creek", "City of Canton - Middle Branch Nimishillen Creek", "Sherrick Run - Nimishillen Creek", and "Town of East Sparta - Nimishillen Creek" watersheds as described in the Ohio EPA 2010 draft Integrated Report Watershed Assessment Unit (WAU) Summaries. Within these watersheds, the report identifies the following causes of impairments: ammonia, direct habitat alterations, impairment unknown, nitrates, nutrients, organic enrichment (sewage) biological indicators, other flow regime alterations, oxygen (dissolved), sedimentation/siltation, sulfates, and water temperature. The report identifies the following sources of impairment: agriculture, channelization, industrial point sources, municipal (urbanized high density area), municipal point sources, on-site treatment systems (septic systems and similar decentralized systems), source unknown, spills, subsurface (hardrock) mining, and urban runoff/storm sewers. The listed sources are not directly identified with any particular listed causes of impairments. Therefore, the listed impairments and sources are those that the City's Public Education Program is generally intended to address.		1/21/2010
Part III.B.1.b.v.	What is [City of Canton's] outreach strategy, including the mechanisms (e.g., printed brochures, newspapers, media, workshops, etc.) [City of Canton] will use to reach [its] target audiences, and how many people does [City of Canton] expect to reach by [its] outreach strategy over the permit term.		----
Response:	Publications, flyers, the City's website, workshops, storm drain markings, and other mechanisms (as they become available and feasible to utilize) are to be the mechanisms the City of Canton is to use to reach its target audiences. See BMPs below for further details and the particular target audiences intended to		1/21/2010
Part III.B.1.b.vi.	Who (person or department) is responsible for overall management and implementation of [City of Canton's] storm water public education and outreach program and, if different, who is responsible for each of the BMPs identified for this program.		----
Response:	Even though the Assistant City Engineer in the Civil Division of the Engineering Department is the primary contact for the SWMP and responsible for preparing annual reports, the Service Director is responsible for the overall management and implementation of the City of Canton's storm water public education and outreach program. However, each BMP listed below identifies the particular City department or entity and position primarily responsible for the implementation of the respective BMP. Each responsible position is to maintain all records of supporting information for respective BMP implementation.		1/21/2010
Part III.B.1.b.vii.	How will [City of Canton] evaluate the success of this minimum measure, including how [City of Canton] selected the measurable goals for each of the BMPs.		----
Response:	In time, the City of Canton is to measure the success of this MCM by determining if the measurable goals for the BMPs are met (through annual reports) as well as by implementing the BMPs in accordance with applicable recommendations as identified on USEPA's National Menu of Stormwater Best Management Practices. Each identified responsible position is to provide the respective information for Annual Reports to Chris Barnes of the City Engineering Department by February 15th, annually. Ideally, the success of the City's SWMP may be evaluated based on the results of field monitoring in the Nimishillen Creek and/or other indicators. Each BMP listed below describes an associated measurable goal or goals. The goals were selected based on some practical and/or quantifiable (if possible) aspect of their implementation and the ease of measuring such aspect which provides simple indication of whether the BMP is successfully implemented.		1/21/2010
Performance Standards			
Part III.B.1.c.	[City of Canton's] storm water public education and outreach program shall include more than one mechanism and target at least five different storm water themes or messages over the permit term. At a minimum, at least one theme or message shall be targeted to the development community. [City of Canton's] storm water public education and outreach program shall reach at least 50 percent of the population over the permit term.		----
Annual Reporting			
Part III.B.1.d.	Annual Reports shall identify each public education mechanism used, including each storm water theme, audience targeting, and an estimate of how many people were reached by each mechanism.		----

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)																	Revised
(Permit Part III.B.1.) Minimum Control Measure (MCM) #1: Public Education and Outreach on Storm Water Impacts																	
"Storm Water Public Education and Outreach Program": Best Management Practices (BMPs)/Public Education Mechanisms used to Satisfy MCM Requirements																	
[1] BMP #	[2] Permit Requirement	Part III.A.1.a. [3] BMP Name	Part III.B.1.b.v. [3A] BMP Type and Theme or Message	Part III.A.1.a. [4] BMP/Mechanism Description	Part III.A.1.e. [5] Rationale for BMP/Mechanism Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.B.1.b.iii. [7] Target Audience (Specific Audience)	Part III.B.1.b.v. [7A] Target Audience (Estimated % of Overall Population)	Part III.A.1.b. [8] Legal Authority to Implement?	Part III.A.1.d. [9] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [10] Agreement Needed?	Part III.A.1.c. [11] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [12] Rationale for Measurable Goal(s) Selection	Part III.B.1.d. [13] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [14] Information for Responsible Position(s) to Maintain for Audits		
1	Storm water education for development community	Storm water education for development community	Workshops addressing project designs that minimize water quality impacts	Through a Memorandum of Understanding between the City of Canton and the Stark SWCD, the Stark SWCD provides annual training opportunities for the development community. Workshops are offered that focus on construction site and post-construction storm water quality controls.	Education programs for developers and the public about project designs that minimize water quality impacts are considered non-structural post-construction BMPs per MCM#5 (Part III.B.5.e.iii.). All permit training/education requirements are to be coordinated, if possible, to avoid duplication of efforts.	(Refer to all USEPA BMPs under MCM#5: Post-Construction Storm Water Management in New Development and Redevelopment)	Development community	<1	Yes	Stark SWCD: Urban Resource Coordinator	Yes	(1) Renew MOU between City and Stark SWCD annually; and (2) once per year, Stark SWCD is to offer at least 1 respective workshop to local developers, contractors, and engineers	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication of MOU renewal; and (2) workshop name, date, number of attendees, attendee representation, training location, topics covered	(1) Copy of MOU and payment verification; and (2) workshop flyer/agenda, attendance list, handouts, etc.	3/15/2010 1/21/2010	
2	Illegal discharge and trash management education	Illegal discharge and trash management education	Flyers addressing hazards associated with illegal discharges and improper disposal of waste	The City's Sanitation Department is involved with trash disposal and waste management. The Sanitation Department distributes trash management educational flyers to all new sanitation customers and upon request. The flyers are also made available at various City departments. Also, the Sanitation department is to provide illegal discharge and trash management education to public employees via email and to the general public via articles in the City's quarterly publication.	Such education is required for MCM #3 (Part III.B.3.f.). All permit training/education requirements are to be coordinated, if possible, to avoid duplication of efforts.	"Trash and Debris Management" (under USEPA MCM#1: Public Education and Outreach on Storm Water Impacts)	Sanitation customers	90	Yes	Sanitation: Superintendent	No	Distribute flyer to all new sanitation customers and upon request	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	Estimate of # of flyers distributed and brief description of content	Copy of flyer; records verifying new sanitation customers	3/9/2010	
			Email addressing hazards associated with illegal discharges and improper disposal of waste				City employees	<1				Once per year send email to City Department heads to post and share with employees		Date email was sent and brief description of content	Copy of email		
			Article addressing hazards associated with illegal discharges and improper disposal of waste				General public	100				Once per year provide educational article in City's quarterly publication		Date article was provided and brief description of content	Copy of article		
3	Government employee training/ education to prevent and reduce storm water pollution from municipal operations	Government employee training/ education	Workshops, literature, etc. addressing prevention and reduction of storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water maintenance	Municipal employee training is necessary to teach staff about potential sources of stormwater contamination and ways to minimize the water quality impact of municipal activities. The City previously purchased a "Municipal Storm Water Pollution Prevention - Storm Watch - Everyday BMPs" training kit which includes a DVD and a kit test for employees which is to be used to assist in implementing this BMP. Specific topics include, but are not limited to: good housekeeping and spill prevention, vehicle and equipment washing and maintenance, spill response and reporting, street and lot maintenance, proper storage of materials, landscaping and lawn care, etc. Also, there are various training/education opportunities provided throughout the year via conferences, training sessions, seminars, etc. by outside resources in which employees attend.	Such education/training is required per MCM #3 (Part III.B.3.f) and MCM #6 (Parts III.B.6.a. and b. and Part III.B.6.e.). All permit training requirements are to be coordinated, if possible, to avoid duplication of efforts.	"Municipal Employee Training and Education" (under USEPA MCM#6: Pollution Prevention/ Good Housekeeping for Municipal Operations)	Employees of the following City departments:	Street	<1	Yes	Street: Superintendent	No	(1) Utilize "Storm Watch" training kit (available at City Engineering Dept) annually to train appropriate employees; and (2) as feasible, utilize other relevant training/ education resources available to train appropriate employees	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if "Storm Watch" training kit was utilized to train appropriate employees; respective training date(s); # of employees trained; and (2) description(s) of other relevant training/ education resource(s) used to train appropriate employees; respective training date(s); # of employees trained	Supporting training documentation specifying date, attendance list, respective training flyer/ agenda; description of training resources used, as applicable	1/21/2010
Civic Center	Civic Center: Manager																
Engineering	Engineering: Engineer																
CSD (Sewer)	(Sewer): Superintendent																
Sanitation	Sanitation: Superintendent																
DMV	DMV: Superintendent																
Building Maintenance	Building Maint.: Superintendent																
Police (Impound)	(Impound): Lieutenant																
Water	Water: Superintendent																
Park	Park: Director																
Recreation	Recreation: Director																
Health	Health: EH Director																
Fire	Fire: Chief																
WRF	WRF: Superintendent																

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)																	Revised
(Permit Part III.B 1.) Minimum Control Measure (MCM) #1: Public Education and Outreach on Storm Water Impacts																	
"Storm Water Public Education and Outreach Program": Best Management Practices (BMPs)/Public Education Mechanisms used to Satisfy MCM Requirements																	
[1] BMP #	[2] Permit Requirement	Part III.A.1.a. [3] BMP Name	Part III.B.1.b.v. [3A] BMP Type and Theme or Message	Part III.A.1.a. [4] BMP/Mechanism Description	Part III.A.1.e. [5] Rationale for BMP/Mechanism Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.B.1.b.iii. [7] Target Audience (Specific Audience)	Part III.B.1.b.v. [7A] Target Audience (Estimated % of Overall Population)	Part III.A.1.b. [8] Legal Authority to Implement?	Part III.A.1.d. [9] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [10] Agreement Needed?	Part III.A.1.c. [11] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [12] Rationale for Measurable Goal(s) Selection	Part III.B.1.d. [13] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [14] Information for Responsible Position(s) to Maintain for Audits		
4	Public education on storm water impacts	Quarterly publication	City quarterly publication addressing various storm water topics	The Assistant City Engineer provides storm water news and education through the "Runoff Rundown" section of the quarterly publication. Sometimes educational materials made available by EPA are utilized within the publication.	The City utilizes an existing quarterly publication to reach out to the general public of the City of Canton on various aspects of City government and activities. The publication is sent to all residences and businesses in the City of Canton, and is therefore an excellent way to reach the entire City of Canton population.	"Developing an Outreach Strategy" & "Educational Displays, Pamphlets, Booklets, and Bill Inserts" (under USEPA MCM#1: Public Education and Outreach on Storm Water Impacts)	General public	100	Yes	Engineering (Civil): Assistant City Engineer	No	Provide 1 storm water education article/educational resource in each of 4 yearly publications	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Brief descriptions of articles/resources and publication dates; estimate of how many people received publication	Copy of articles/resources; estimate of # of recipients	3/15/2010	
5	Public education on storm water impacts	City website	City website addressing various storm water topics	The Engineering Department has the ability to add information to the website as needed, and therefore is to ensure that storm water educational materials and/or links are provided.	The City has an existing website that is a low-cost and excellent resource for education to website visitors and can easily be modified to include new information.	"Developing an Outreach Strategy" (under USEPA MCM#1: Public Education and Outreach on Storm Water Impacts)	General public	?	Yes	Engineering (Civil): Assistant City Engineer	No	Continually provide storm water education materials/links on City website	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Description of types of storm water education resources/links provided on website, relevant updates, etc.	(Maintain website accordingly)	1/21/2010	

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)		Revised
(Permit Part III.B.2.) Minimum Control Measure (MCM) #2: Public Involvement/Participation		
MCM Permit Requirement(s)		
Part III.B.2.a.	[City of Canton] shall comply with State and local public notice requirements and satisfy this minimum control measure's minimum performance standards when implementing a public involvement/participation program.	----
Decision Process (Rationale Statement) for Development of Storm Water Public Involvement/Participation Program		
Part III.B.2.b.	[City of Canton] shall document [its] decision process for the development of a storm water public involvement/participation program. [City of Canton's] rationale statement shall address both [its] overall public involvement/participation program and the individual BMPs, measurable goals, and responsible persons for [City of Canton's] program.	
Response:	The City of Canton supports EPA's assessment that the City should involve the public in developing, implementing, updating, and reviewing its SWMP. The Storm Water Public Involvement/Participation Program should make efforts to reach out and engage various economic and ethnic groups. The public can provide valuable input and assistance to the City's SWMP and, therefore, that the public be given opportunities to play an active role on both the development and implementation of the SWMP. An active and involved community is crucial to the success of a SWMP because it allows for: (1) "Broader public support" since citizens who participate in the development and decision-making process are partially responsible for the program and, therefore, may be less likely to raise legal challenges to the program and more likely to take an active role in its implementation; (2) "Shorter implementation schedules" due to fewer obstacles in the form of public and legal challenges and increased sources in the form of citizen volunteers; (3) "A broader base of expertise and economic benefits" since the community can be a valuable, and free, intellectual resource; and (4) "A conduit to other programs" as citizens involved in the SWMP development process provide important cross-connections and relationships with other community and government programs. See USEPA's Stormwater Phase II Final Rule Fact Sheet Series at http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm for further information on the NPDES Phase II Small MS4 Storm Water Program and the associated Minimum Control Measures. The City of Canton is to implement the BMPs described below as part of its Storm Water Public Involvement/Participation Program. The identified BMPs are those that the City believes are needed to meet permit requirements and/or expectations. See "Public Involvement/Participation" on USEPA's National Menu of Stormwater Best Management Practices at http://cfpub.epa.gov/npdes/stormwater/menuofbmps/ for further BMP guidance and information.	1/21/2010
Part III.B.2.b.	The rationale statement shall include the following information, at a minimum:	----
Part III.B.2.b.i.	Has [City of Canton] involved the public in the development and submittal of [its] NOI and SWMP description?	
Response:	Throughout the planning stages of preparing for NPDES Phase II under the initial 2003 permit, the City of Canton had meetings with the Stark County Regional Planning Commission (RPC) to specifically discuss the NPDES Phase II program requirements and plan preparation strategy. These were mostly informative meetings for the City of Canton. Stark RPC held public meetings in which NPDES Phase II updates were provided and public input was welcomed. Also, NPDES Phase II plan preparation strategy and partnership with Stark RPC was discussed at City Council meetings in which public input was welcomed. However, no public input was received and therefore the general public was not a factor in the development and submittal of the City's Notice Of Intent (NOI) and SWMP.	1/21/2010
Part III.B.2.b.ii.	What is [City of Canton's] plan to actively involve the public in the development and implementation of [its] program?	----
Response:	Since 2003, aspects of NPDES Phase II and the City's SWMP have been subjects at various levels of public access, such as: through the City's website, publications, announcements, public meetings, and other means of communication. In addition to these mechanisms, the general public also has the ability to obtain information, report concerns, and provide comments on various issues to the City in person, by phone, mail, or email. Public involvement in the development of the City's SWMP has unfortunately been non-existent. Public implementation of the SWMP can be determined by the success of meeting the various measurable goals for applicable BMPs, as reported in annual reports since 2003.	1/21/2010
Part III.B.2.b.iii.	Who are the target audiences for [City of Canton's] public involvement program, including a description of the types of ethnic and economic groups engaged? [City of Canton] is encouraged to actively involve all potentially affected stakeholder groups, including commercial and industrial businesses, trade associations, environmental groups, homeowners associations, and educational organizations, among others.	----
Response:	The general public, which is made up of various types of ethnic and economic groups, is the overall target audience for the City of Canton's Storm Water Public Involvement/Participation Program. However, each BMP listed below lists the specific target audience it is intended to reach.	1/21/2010
Part III.B.2.b.iv.	What are the types of public involvement activities included in [City of Canton's] program? Where appropriate, consider the following types of public involvement activities: citizen representatives on a storm water management panel, public hearings, working with citizen volunteers willing to educate others about the program, volunteer monitoring or stream/beach clean-up activities.	----
Response:	Public involvement activities range from street, neighborhood, and park cleanups to watershed groups. See BMPs below for further information.	1/21/2010
Part III.B.2.b.v.	Who (person or department) is responsible for the overall management and implementation of [City of Canton's] storm water public involvement/participation program and, if different, who is responsible for each of the BMPs identified for this program?	----
Response:	Even though the Assistant City Engineer in the Civil Division of the Engineering Department is the primary contact for the SWMP and responsible for preparing annual reports, the Service Director is responsible for the overall management and implementation of the City of Canton's storm water public involvement/participation program. However, each BMP listed below identifies the particular City department or entity and position primarily responsible for the implementation of the respective BMP. Each responsible position is to maintain all records of supporting information for respective BMP implementation.	1/21/2010
Part III.B.2.b.vi.	How [City of Canton] will evaluate the success of this minimum measure, including how [City of Canton] selected the measurable goals for each of the BMPs.	----
Response:	In time, the City of Canton is to measure the success of this MCM by determining if the measurable goals for the BMPs are met (through annual reports) as well as by implementing the BMPs in accordance with applicable recommendations as identified on USEPA's National Menu of Stormwater Best Management Practices. Each identified responsible position is to provide the respective information for Annual Reports to Chris Barnes of the City Engineering Department by February 15th, annually. Ideally, the success of the City's SWMP may be evaluated based on the results of field monitoring in the Nimishillen Creek and/or other indicators. Each BMP listed below describes an associated measurable goal or goals. The goals were selected based on some practical and/or quantifiable (if possible) aspect of their implementation and the ease of measuring such aspect which provides simple indication of whether the BMP is successfully implemented.	1/21/2010
Performance Standards		----
Part III.B.2.c.	[City of Canton's] storm water public involvement/participation program shall include, at a minimum, five public involvement activities over the permit term.	
Annual Reporting		----
Part III.B.2.d.	Annual Reports shall identify each public involvement/participation activity conducted, including a brief description of activity and shall include an estimate of how many people participated.	

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)**(Permit Part III.B.2.) Minimum Control Measure (MCM) #2: Public Involvement/Participation****"Storm Water Public Involvement/Participation Program": Best Management Practices (BMPs)/Public Involvement Activities used to Satisfy MCM Requirements**

[1] BMP #	[2] Permit Requirement	Part III.A.1.a. [3] BMP Name	Part III.B.2.b.iv. [3A] BMP Type and Theme or Message	Part III.A.1.a. [4] BMP/Activity Description	Part III.A.1.e. [5] Rationale for BMP/Activity Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.B.2.b.iii. [7] Target Audience	Part III.A.1.b. [8] Legal Authority to Implement?	Part III.A.1.d. [9] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [10] Agreement Needed?	Part III.A.1.c. [11] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [12] Rationale for Measurable Goal(s) Selection	Part III.B.2.d. [13] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [14] Information for Responsible Position(s) to Maintain for Audits	Revised
1	Public involvement/participation in storm water activity	Beautify A Neighborhood (BAN) Program	Neighborhood associations partnering with City Street Department to conduct neighborhood cleanups	In 2006, the City of Canton Street Department introduced the BAN Program with the objective of fostering neighborhood beautification through a dedication of public resources to those neighborhood groups willing to assist the City in the process. Street Department employees assist residents with neighborhood cleanup projects. The BAN Program establishes scheduled dates for the City and neighborhood groups to partner up for neighborhood cleanups, one neighborhood at a time. None days are scheduled between April 1st and October 31st of each year. Any individual or organization within the City can apply for one of the available dates.	Cleanups prevent litter and trash from washing into the City's MS4 and polluting local water bodies.	(Refer to all Public Involvement/ Participation BMPs on USEPA's National Menu of Best Management Practices)	City Neighborhood Associations	Yes	Street: Superintendent	No	Utilize all 9 days set aside per year for neighborhood cleanups	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Brief description of activity (including date(s), location(s), etc., if possible); estimate of # of participants	Supporting documentation such as copies of activity advertisement, sign-up/ attendance sheets, etc.	3/15/2010
2	Public involvement/participation in storm water activity	Stark Community Foundation's Neighborhood Partnership Grant Program	Grant program for neighborhood associations to conduct community cleanups	The City of Canton's Development Department and some private partners have a joint funding partnership with Stark Community Foundation (SCF) in which funds are provided from the City via the Neighborhood Partnership Grant Program (NPGP) to neighborhood associations to help conduct various activities including community cleanups. Most participating neighborhood associations conduct two cleanups per year.	Cleanups prevent litter and trash from washing into the City's MS4 and polluting local water bodies. See www.starkcf.org/neighborhood_partnership.asp for more details.	(Refer to all Public Involvement/ Participation BMPs on USEPA's National Menu of Best Management Practices)	City Neighborhood Associations and residents	Yes, via partnership	Development: Director	Yes	(1) Continue to partner with Stark Community Foundation to provide the NPGP; and (2) conduct community cleanups every year	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication of continued partnership with SCF; and (2) # of community cleanups conducted; brief description (date(s), location(s), estimate of # of participants)	(1) Copy of partnership agreement; and (2) supporting documentation (copy of activity advertisement, sign-up sheets, etc.)	1/21/2010
3	Public involvement/participation in storm water activity	Canton Municipal Court's Community Service Road Crew Cleanups	General public sentenced to community service performing cleanups	When the Canton Municipal Court sentences people to perform community service, some of the people are assigned to the Road Crew. The Canton Municipal Court's Road Crew picks up litter and trash from the streets of Canton as well as cleaning up nuisance properties for the City of Canton's Code Enforcement and Health Department. Certain areas are targeted based on complaints received.	Cleanups prevent litter and trash from washing into the City's MS4 and polluting local water bodies.	(Refer to all Public Involvement/ Participation BMPs on USEPA's National Menu of Best Management Practices)	Community service workers	Yes	Judges: Community Service Director	No	Continue to utilize Road Crew Cleanups as a means of required community service for the general public	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Brief description of activity (including date(s), location(s), etc., if possible); estimate of # of participants	Supporting documentation such as copy of Road Crew policies, lists of participants, etc.	1/21/2010
4	Public involvement/participation in storm water activity	Canton Parks Cleanups	Cleanup and beautification activities within Canton Parks	Various cleanup and beautification activities take place within Canton Parks throughout the year. Many of these parks have streams, ponds, lakes, or wetlands located within them.	Cleanups prevent litter and trash from washing into the City's MS4 and polluting local water bodies.	(Refer to all Public Involvement/ Participation BMPs on USEPA's National Menu of Best Management Practices)	General public	Yes	Park: Director	No	Conduct one Canton Park cleanup per year	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Brief description of activity (including date(s), location(s), etc., if possible); estimate of # of participants	Supporting documentation (copy of activity advertisement, sign-up sheets, etc.)	1/21/2010
5	Public involvement/participation in storm water activity	Keep Canton Clean Program	Neighborhood cleanups and pollution education	Mayor William Healy, Canton City Schools, local McDonald's franchisees, and Wal-Mart team up with residents to improve the appearance of city streets by cleaning up unsightly litter and other garbage at designated locations. Volunteers are provided with cleanup materials and also receive a free lunch donated by McDonald's. The cleanup is done in conjunction with Canton City Schools' Keep Canton Clean Education Series which informs students about the short and long-term ramifications of littering and pollution, as well as some of the serious challenges city employees face with regard to litter, pollution, and illegal dumping.	Cleanups prevent litter and trash from washing into the City's MS4 and polluting local water bodies.	(Refer to all Public Involvement/ Participation BMPs on USEPA's National Menu of Best Management Practices)	General public and students	Yes	Mayor: Management Assistant	No	Conduct one neighborhood cleanup per year	Stated goal is easily measurable and demands indication if BMP implementation is in accordance with permit expectations	Brief description of activity (including date(s), location(s), etc., if possible); estimate of # of participants	Supporting documentation (copy of activity advertisement, sign-up sheets, etc.)	1/21/2010

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)			Revised
(Permit Part III.B.3.) Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination			
MCM Permit Requirement(s)			
Part III.B.3.a.	[City of Canton] shall develop, implement, and enforce a program to detect and eliminate illicit discharges, as defined in Part IV of the permit, into its MS4 (for illicit discharges to the MS4 via an adjacent, outside-of-jurisdiction-interconnected-MS4, [City of Canton] is only required to inform the neighboring MS4 and Ohio EPA in its Annual Report submission, of their existence).		
Part III.B.3.b.	[City of Canton] shall develop, if not already completed, a comprehensive storm sewer system map, showing the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls. Within five years of when [City of Canton's] coverage under this general permit was granted [6/4/2009], [City of Canton's] comprehensive storm sewer system map shall also include [City of Canton's] MS4 (owned or operated by [City of Canton]), including catch basins, pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality BMPs and private post-construction water quality BMPs which have been installed to satisfy Ohio EPA's NPDES Construction Storm Water general permit and/or [City of Canton's] local post-construction water quality BMP requirements. If [City of Canton] will be unable to develop [its] comprehensive storm sewer system map during this permit term, [City of Canton] shall provide an alternative schedule to complete with [its] 2009 Annual Report.		
Part III.B.3.c.i.	Within five years of when [City of Canton's] initial Small MS4 general permit coverage was granted (04/03/2003), [City of Canton] shall submit the following to Ohio EPA:		
Part III.B.3.c.i.	A list of all on-site sewage disposal systems connected to discharge to [City of Canton's] MS4 (a.k.a. home sewage treatment systems (HSTSS)) including addresses; and		
Part III.B.3.c.ii.	A storm sewer map showing the location of all HSTSS connected to [City of Canton's] MS4. This map shall include details on the type and size of conduits/ditches in [City of Canton's] MS4 that receive discharges from HSTSS, as well as the water bodies receiving the discharges from [City of Canton's] MS4.		
Part III.B.3.d.	[City of Canton] shall, to the extent allowable under State or local law, effectively prohibit, through ordinance or other regulatory mechanism, illicit discharges into [City of Canton's] storm sewer system and implement appropriate enforcement procedures and actions.		
Part III.B.3.e.	[City of Canton] shall develop and implement a plan to detect and eliminate non-storm water discharges, including illegal dumping, to [City of Canton's] system. At a minimum, for household sewage treatment systems (HSTSS), [City of Canton's] plan shall address or include provisions for:		
Part III.B.3.e.i.	Working with the appropriate Board(s) of Commissioners, other public officials, local waste water authorities, any other appropriate entity and local board(s) of health, to proactively identify residences with existing individual discharging HSTSS that can be legally, feasibly, and economically connected to central sewers. At a minimum, the plan shall evaluate applying provisions identified by ORC 6117.51 and other applicable State and local laws and/or regulations. At a minimum, this activity should require connection to central sewers for any discharging HSTS that is not operating as designed and intended if feasible, but it does not preclude connection to central sewers of any HSTS if local planning and coordination recommends such;		----
Part III.B.3.e.ii.	Working with local board(s) of health to develop a proactive operation and maintenance program or implement/enhance an existing operation and maintenance program which determines if existing discharging HSTSS are operating as designed and intended and, for those not meeting this criteria, requires elimination, upgrade, or replacement of the systems as appropriate. For HSTS discharges that cannot be eliminated through connection to central sewers or installation of soil absorption systems, the property owner must be notified of the requirement to pursue coverage under an appropriate Ohio EPA general NPDES permit;		
Part III.B.3.e.iii.	Actively investigating the source(s) of contamination in outfalls during dry weather screening process. When the contamination source has been identified as discharging HSTS that is not operating as designed and intended, work with the local board(s) of health to determine proper course of action in resolving the non-functioning HSTS with connection to central sewers being preferred alternative, followed by replacing systems with a soil absorption system that does not discharge and only allowing a replacement discharging HSTS when no other option is available. For HSTS discharges that cannot be eliminated through connection to central sewers or installation of soil absorption systems, the property owner must be notified of the requirement to pursue coverage under an appropriate Ohio EPA general NPDES permit; and		
Part III.B.3.e.iv.	Working with local waste water authorities, planning agencies or other appropriate agencies involved to evaluate the planned or possible future installation of sewers for areas which contain high densities of discharging HSTSS.		
Part III.B.3.f.	[City of Canton] shall inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste; and		
Part III.B.3.g.	[City of Canton] shall address the following categories of non-storm water discharges or flows (i.e. illicit discharges) only if [City of Canton] identifies them as significant contributors of pollutants to [City of Canton's] small MS4: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20)), uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, street wash water, and discharges from fire fighting activities (by definition, not an illicit discharge).		
Part III.B.3.h.	[City of Canton] may also develop a list of other similar occasional incidental non-storm water discharges (e.g. non-commercial or charity car washes, etc.) that will not be addressed as illicit discharges. These non-storm water discharges must not be reasonably expected (based on information available to the permittees) to be significant sources of pollutants to the MS4, because of either the nature of the discharges or conditions [City of Canton] has established for allowing these discharges to [City of Canton's] MS4 (e.g. a charity car wash with appropriate controls on frequency, proximity to sensitive water bodies, BMPs on the wash water, etc.). [City of Canton] must document in [City of Canton's] SWMP any local controls or conditions placed on the discharges. [City of Canton] must include a provision prohibiting any individual non-storm water discharge that is determined to be contributing significant amounts of pollutants to [City of Canton's] MS4.		
Decision Process (Rationale Statement) for Development of Storm Water Illicit Discharge Detection and Elimination (IDDE) Program			
Part III.B.3.i.	[City of Canton] shall document [its] decision process for the development of a storm water illicit discharge detection and elimination program. [City of Canton's] rationale statement shall address both [its] overall illicit discharge detection and elimination program and the individual BMPs, measurable goals, and responsible persons for [its] program.		
Response:	The City of Canton supports EPA's assessment that the implementation of an effective IDDE Program allows the City to gain a thorough awareness of its MS4 which allows the City to determine the types and sources of illicit discharges entering the MS4 and establish the legal, technical, and educational means needed to eliminate these discharges. See USEPA's Stormwater Phase II Final Rule Fact Sheet Series at http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm for further information on the NPDES Phase II Small MS4 Storm Water Program and the associated Minimum Control Measures. The City of Canton is to implement the BMPs described below as part of its IDDE Program. The identified BMPs are those that the City believes are needed to meet permit requirements and/or expectations. See "Illicit Discharge Detection and Elimination" on USEPA's National Menu of Stormwater Best Management Practices at http://cfpub.epa.gov/npdes/stormwater/menuofbmps/ for further BMP guidance and information.		1/21/2010
Part III.B.3.i.	The rationale statement shall include the following information, at a minimum:		----
Part III.B.3.i.i.	How [City of Canton] will develop a comprehensive storm sewer map showing the location of all outfalls and the names and location of all receiving waters. Describe the sources of information [City of Canton] used for the maps, and how [City of Canton] plans to verify the outfall locations with field surveys. If already completed, describe how [City of Canton] developed this map. Also, describe how [City of Canton's] map will be regularly updated.		
Response:	The City of Canton previously developed a "storm sewer system map, showing locations of all outfalls and the names and locations of all surface waters of the State that receive discharges from those outfalls" as required under the initial 2003 NPDES Small MS4 Permit. Additional information as required by the 2009 permit is to be added to that map accordingly to meet permit requirements. See "MS4 map" BMP below for further details.		1/21/2010
Part III.B.3.i.ii.	The mechanism (ordinance or other regulatory mechanism) [City of Canton] will use to effectively prohibit illicit discharges into the MS4 and why [City of Canton] chose that mechanism. If [City of Canton] needs to develop this mechanism, describe a plan and a schedule to do so. If [City of Canton's] ordinance or other regulatory mechanism is already developed, include a copy of the relevant sections with [City of Canton's] program.		----
Response:	The City of Canton is to utilize an ordinance as the regulatory mechanism to prohibit illicit discharges into the MS4. Ordinances are the typical legislative mechanisms for cities to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City ordinances were used to satisfy the regulatory intent of this minimum control measure. In 2009, a new storm water management ordinance was adopted. See "Storm water management ordinance" BMP below for further details.		1/21/2010
Part III.B.3.i.iii.	[City of Canton's] plan to ensure through appropriate enforcement procedures and actions that [its] illicit discharge ordinance (or other regulatory mechanism) is implemented.		----
Response:	The City of Canton's "Storm Water Management Ordinance" includes prohibitions and enforcement mechanisms to ensure compliance with is possible. The ordinance provides for plan denials, Notices Of Violations, Stop Work Orders, injunctive relief, civil proceedings, fines, etc. to be utilized accordingly. See "Storm water management ordinance" and other BMPs below for further details.		1/21/2010
Part III.B.3.i.iv.	[City of Canton's] plan to detect and address illicit discharges into [its] system, including discharges from illegal dumping and spills. [City of Canton's] plan shall include dry weather field screening for non-storm water flows and Ohio EPA recommends field tests of selected chemical parameters as indicators of discharge sources. [City of Canton] shall describe the mechanisms and strategies [it] will implement to ensure outfalls which have previously been dry-weather screened will not have future illicit connections. [City of Canton's] plan shall also address on-site sewage disposal systems (including failing on-lot HSTSS and off-lot discharging HSTSS) that flow into [City of Canton's] storm drainage system. [City of Canton's] description shall address the following, at a minimum:		----
Response:	The City of Canton has a plan to detect and address illicit discharges in the MS4. The plan includes provisions for addressing discharges from illegal dumping and spills, dry-weather field-screening for non-storm water flows, safeguarding against illicit connections, addressing HSTSS, etc. See the BMPs below for further details.		1/21/2010
Part III.B.3.i.iv.1.	Procedures for locating priority areas which include areas with higher likelihood of illicit connections (e.g. areas with older sanitary sewer lines, for example) or ambient sampling to locate impacted reaches;		----
Response:	The City of Canton has procedures in place for locating priority areas with higher likelihood of illicit connections, such as locating all HSTS properties, monitoring all storm and sanitary sewer connections by requiring permits and inspections, and identifying areas with sanitary sewers having high levels of inflow and infiltration. See "Locating areas with HSTSS", "Monitoring sewer connections", and "Resolving sanitary sewer I&I and illicit connections" BMPs below for further details.		1/21/2010
Part III.B.3.i.iv.2.	Procedures for tracing the source of an illicit discharge, including the specific techniques [City of Canton] will use to detect the location of the source;		----
Response:	The City of Canton has procedures in place for tracing the sources of illicit discharges, such as sewer televising and sewer dye-testing. See "Televising storm sewers" and "Sewer dye-testing" BMPs below for further details.		1/21/2010
Part III.B.3.i.iv.3.	Procedures for removing the source of the illicit discharge; and		----
Response:	The City of Canton has procedures in place for removing the source of illicit discharges. See "Procedures for removing the source of illicit discharges" BMP below for further details.		1/21/2010

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)		Revised
(Permit Part III.B.3.) Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination		
Part III.B.3.i.iv.4.	Procedures for program evaluation and assessment.	----
Response:	The City of Canton has procedures in place for program evaluation and assessment. See "Storm Water IDDE Program evaluation and assessment" BMP below for further details.	1/21/2010
Part III.B.3.i.v.	How [City of Canton] plans to inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste. Include in [City of Canton's] description how this plan will coordinate with [City of Canton's] public education minimum measure and [its] pollution prevention/good housekeeping minimum measure programs.	----
Response:	The City of Canton informs public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste via flyers, emails, articles in publications, workshops, etc. See "Illegal discharge and trash management education" BMP below for further details.	1/21/2010
Part III.B.3.i.vi.	Who is responsible for overall management and implementation of [City of Canton's] storm water illicit discharge detection and elimination program and, if different, who is responsible for each of the BMPs identified for this program.	----
Response:	Even though the Assistant City Engineer in the Civil Division of the Engineering Department is the primary contact for the SWMP and responsible for preparing annual reports, the Service Director is responsible for the overall management and implementation of the City of Canton's IDDE Program. However, each BMP listed below identifies the particular City department or entity and position primarily responsible for the implementation of the respective BMP. Each responsible position is to maintain all records of supporting information for respective BMP implementation.	1/21/2010
Part III.B.3.i.vii.	How [City of Canton] will evaluate the success of this minimum measure, including how [City of Canton] selected the measurable goals for each of the BMPs.	----
Response:	In time, the City of Canton is to measure the success of this MCM by determining if the measurable goals for the BMPs are met (through annual reports) as well as by implementing the BMPs in accordance with applicable recommendations as identified on USEPA's National Menu of Stormwater Best Management Practices. Each identified responsible position is to provide the respective information for Annual Reports to Chris Barnes of the City Engineering Department by February 15th, annually. Ideally, the success of the City's SWMP may be evaluated based on the results of field monitoring in the Nimishillen Creek and/or other indicators. Each BMP listed below describes an associated measurable goal or goals. The goals were selected based on some practical and/or quantifiable (if possible) aspect of their implementation and the ease of measuring such aspect which provides simple indication of whether the BMP is successfully implemented.	1/21/2010
Performance Standards		
Part III.B.3.j.	The City of Canton's Storm Water IDDE Program shall include or have included an initial dry-weather screening of all storm water outfalls over the permit term. The City of Canton's IDDE Program shall establish priorities and specific goals for long-term system-wide surveillance of the City's MS4, as well as for specific investigations of outfalls and their tributary area where previous surveillance demonstrates a high likelihood of illicit discharges. Data collected each year shall be evaluated and priorities and goals shall be revised annually based on this evaluation. The City of Canton's comprehensive storm sewer system map shall be updated annually as needed.	----
Annual Reporting		
Part III.B.3.k.	Annual Reports shall document the following: (1) number of outfalls dry-weather screened, (2) number of dry-weather flows identified, (3) number of illicit discharges identified, (4) number of illicit discharges eliminated, (5) schedules for elimination of illicit connections that have been identified but have yet to be eliminated, and (6) summary of any storm sewer system mapping updates.	----

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)													Revised
(Permit Part III.B.3.) Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination													
"Storm Water Illicit Discharge Detection and Elimination (IDDE) Program": Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements													
[1] BMP #	[2] Permit Requirement	Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.a. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.e. [7] Legal Authority to Implement?	Part III.A.1.d. [8] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [9] Agreement Needed?	Part III.A.1.c. [10] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [11] Rationale for Measurable Goal(s) Selection	Part III.B.3.k. [12] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [13] Information for Responsible Position(s) to Maintain for Audits	
1	Comprehensive storm sewer system map	MS4 map	The City Engineering Department maintains hard copies of maps of storm and sanitary sewers, based on "as-built" data. These maps were used as a starting point for creating an electronic "base map" that was used to satisfy initial 2003 NPDES Small MS4 Permit requirements. Additional information as required in the 2009 permit is to be added to this map to satisfy the permit requirements. A comprehensive storm system map allows for effective investigations of potential contamination sources as well as providing potential containment and outfall locations for illicit discharges in the MS4. The MS4 map must be updated accordingly as new installations, replacements, realignments, and additions (due to annexations) to the MS4 occur frequently. Once the map is completed in electronic format, updates can occur quickly and efficiently.	Required per Part III.B.3.b.	(Refer to MCM#3: Illicit Discharge Detection and Elimination description on USEPA's National Menu of Best Management Practices)	Yes	Engineering (Civil): Assistant City Engineer	No	As required, map is to be developed within 5 years of coverage under 2009 renewal Small MS4 General Permit (by 6/4/2014)	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Progress/status of map development; information required for Map; any necessary map updates	Copy of map; supporting documentation of map development progress and/or updates, as necessary	3/15/2010 1/21/2010
2	Development and submittal of Home Sewage Treatment Systems (HSTS) list	HSTS list	Effluent from failing HSTSs often contain pollutant concentrations that exceed established water quality standards. A number of factors can cause on-lot HSTSs to fail, including unsuitable soil conditions, improper design and installation, and inadequate maintenance practices. Identifying and eliminating failing HSTSs help control untreated wastewater discharges that contaminate ground and surface water supplies. The City Health Department maintains all HSTS records for HSTS properties in the City. Due to the availability of sanitary sewer, new applications for HSTS installations are typically denied (see "Addressing HSTSs" BMP). In 2006-2007, the City Health Department identified and field-verified a total of 99 HSTS-properties within the City (by cross-checking City and County HSTS records and water and sewer utility billing records). Each property was individually checked for authenticity. All 99 HSTS-properties in the City of Canton are "on-lot HSTSs" (there are no "off-lot HSTSs" in the City). The list was submitted to Ohio EPA in 2008.	Required per Part III.B.3.c.i. Also, this allows for effective investigations of potential contamination sources of water bodies.	"Preventing Septic System Failure" and "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination)	Yes	Health: Environmental Health Director	No	(HSTS list previously developed as required under the initial NPDES Permit and submitted to Ohio EPA in 2008); update list as necessary	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Progress/status of HSTS list and any necessary updates	Copy of list and supporting documentation, as applicable	1/21/2010
3	Development and submittal of HSTS map	HSTS map	Based on information obtained for the required HSTS list (see "HSTS list" BMP), an HSTS map was created using GIS software. The HSTS Map was finalized and submitted to Ohio EPA in 2008. Although the requirement for the development of an HSTS map is for HSTSs connected to discharge to the City's MS4 ("off-lot HSTSs"), there are only "on-lot HSTSs" in the City of Canton. Therefore, the HSTS map only shows the locations of the "on-lot HSTSs" in Canton.	Required per Part III.B.3.c.ii. Also, this allows for effective investigations of potential contamination sources of water bodies.	"Preventing Septic System Failure" and "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination)	Yes	Health: Environmental Health Director	No	(HSTS map previously developed as required under the initial NPDES Permit and submitted to Ohio EPA in 2008); update map as necessary	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Progress/status of HSTS map and any necessary updates	Copy of map and supporting documentation, as applicable	1/21/2010
4	Ordinance or other regulatory mechanism prohibiting illicit discharges into storm sewer system	Storm water management ordinance	Parts of Chapters 221 (Health Hazards), 223 (Private Water Systems), and 225 (Household Sewage Disposal Systems) of Title Three - Environmental Health - of the Canton City Health Code, and Part Five (General Offenses Code), Part Seven (Business Regulation Code), Part Nine (Streets, Utilities, and Public Services Code), and Part Thirteen (Building Code) of the City of Canton Codified Ordinances collectively regulate illicit discharges. However, in 2009 the City adopted a "Storm Water Management" ordinance (Chapter 961 of Part Nine - Streets, Utilities, and Public Services Code) which is intended to consolidate provisions within existing ordinances and satisfy permit requirements that were not addressed by existing City ordinances. Chapter 961 includes prohibitions of illicit discharges into the MS4, violations, enforcement, penalties, etc. Refer to Chapter 961 "Storm Water Management" ordinance and the "City of Canton Storm Water Management Manual" for further details.	Required per Part III.B.3.d.	(Refer to MCM#3: Illicit Discharge Detection and Elimination description on USEPA's National Menu of Best Management Practices)	Yes	Engineering: City Engineer	No	(1) Continue to prohibit illicit discharges to MS4 through "Storm Water Management" ordinance; and (2) ensure ordinance meets current permit requirements	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if illicit discharges to MS4 are prohibited by ordinance; and (2) summary of any relevant revisions to ordinance	(1) Copy of current ordinance; and (2) supporting documentation, as applicable	1/21/2010
5	Plan to Detect and Eliminate Non-Storm Water/Illicit Discharges to MS4 (continued on next page)	Addressing illicit discharges, including discharges from illegal dumping and spills	Illicit discharge protocols	The City has prepared employee protocols for responses to any known or suspected illicit discharge in the MS4. These protocols include required notification of the Fire Department within 15 minutes of report or discovery of the known or suspected illicit discharge. The Fire Department also has internal protocol to follow which includes involving the HazMat Team, Collection Systems (Sewer) Department, etc., as necessary, as well as containment, cleanup, and source-tracing provisions. A report is then filed with the City Engineer who forwards to the City Service Director or other appropriate City Department, if necessary, for enforcement actions. Also, littering and illegal dumping are prohibited by Codified Ordinance Chapter 521.08 and are handled through the City Health Department. Any illicit discharges into the MS4 resulting from illegal dumping and spills are to be addressed the same way as all other illicit discharges per City protocols.	BMP assists in satisfying Part III.B.e.	Yes	Fire: Fire Chief Engineering: City Engineer	No	Address illicit discharges as per established protocol and in accordance with other applicable BMPs.	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	Fire Dept to provide "Report for Illicit Discharge In MS4" to City Engineer; City Engineer to summarize # of illicit discharges identified, locations, # eliminated, dates, schedules for elimination of identified illicit connections	"Report for Illicit Discharge in MS4" for all responses to illicit discharges Copy of each "Report for Illicit Discharge in MS4"; other applicable supporting info.	1/21/2010

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)															Revised
(Permit Part III.B.3.) Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination															
"Storm Water Illicit Discharge Detection and Elimination (IDDE) Program": Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements															
[1] BMP #	[2] Permit Requirement		Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.a. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.e. [7] Legal Authority to Implement?	Part III.A.1.d. [8] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [9] Agreement Needed?	Part III.A.1.c. [10] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [11] Rationale for Measurable Goal(s) Selection	Part III.B.3.k. [12] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [13] Information for Responsible Position(s) to Maintain for Audits		
6	Plan to Detect and Eliminate Non-Storm Water/Illicit Discharges to MS4 (continued from previous page and on next page):	Provisions for addressing Household Sewage Treatment Systems (HSTSs)	Addressing HSTSs	Chapter 225 of the Canton City Health Code regulates Household Sewage Disposal Systems. The regulations reference Chapter 3701-29 of the Ohio Administrative Code as the minimum compliance standard for enforcement by the City Health Department. Chapter 225 of the Canton City Health Code also prohibits the installation, maintenance, or operation of HSTSs on property within the City provided a public sanitary sewer is within 200 feet of such property. Registration of HSTS installers and sewage tank cleaners is required with the Health Department. Specific maintenance requirements are also required per Chapter 225. The Health Department has the authority to inspect HSTSs, sample the effluent, or take any other steps deemed necessary to insure proper compliance with OAC 3701-29-01 to 3701-29-21. Chapter 209 of the City Health Code provides for any necessary enforcement, inspection, and penalty. There are 99 "on-lot HSTSs" and no "off-lot HSTSs" in the City (See "HSTS list" BMP).	Required per Part III.B.e. and subsections i.-iv.	"Preventing Septic System Failure" and "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination)	Yes	Health: Environmental Health Director	No	(1) Continue to regulate HSTSs per Chapter 225 of the Canton City Health Code; and (2) address HSTSs in accordance with permit requirements Part III.B.e and subsections i.-iv., as applicable	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Summary of # of "on-lot" and "off-lot" HSTSs within City, # of HSTSs identified as illicit discharges to MS4; and (2) progress of addressing HSTSs per permit requirements, as applicable	(1) Supporting HSTS records and inspection documentation; and (2) supporting documentation, as applicable	3/15/2010	
7		Dry-weather field-screening of storm water outfalls for non-storm water flows	Dry-weather field-screening of storm water outfalls	Dry-weather field-screening of storm water outfalls identified by the City Engineering Department via the Storm Sewer System Map created under the initial 2003 NPDES permit or as otherwise updated. An initial dry-weather screening of outfalls was conducted by the City Engineering Department in 2007 in cooperation with initial permit requirements. Results were tabulated in a spreadsheet. This spreadsheet is to be utilized for conducting future screenings. By performing dry-weather field-screenings, illicit discharges may be easier to detect, trace, and eliminate.	Required per Part III.B.3.i.iv.	"Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments" resource (under USEPA MCM#3: Illicit Discharge Detection and Elimination)	Yes	Engineering (Civil): Assistant City Engineer	No	Perform minimum of one dry-weather field screening of all identified outfalls during 2nd permit term (between 2009-2014)	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Total # of outfalls, # of outfalls dry-weather screened; # of dry-weather flows identified	Outfall database and inspection sheets	1/21/2010	
8		Mechanisms and strategies to ensure previously dry-weather field-screened outfalls will not have future illicit connections	Mechanisms and strategies to ensure previously dry-weather field-screened outfalls will not have future illicit connections	Any dry-weather flows discovered during dry-weather field-screenings of storm water outfalls are to be noted accordingly and further evaluated. If identified as a possible illicit discharge, existing illicit discharge protocols are to be followed (see "Illicit discharge protocols" BMP). In addition, Codified Ordinance Part 9 regulates connections to public utilities. Permits are required to be obtained from the City Engineering Department for any proposed connection to public storm or sanitary sewer. Dry-weather flow locations are to be located on a map and used in conjunction with the Storm Sewer System Map as an attempt to identify sections of the MS4 to focus priorities for elimination of illicit discharges.	Required per Part III.B.3.i.iv.	"Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments" resource (under USEPA MCM#3: Illicit Discharge Detection and Elimination)	Yes	Engineering: City Engineer	No	(1) Develop map showing screened outfalls with dry-weather flows; and (2) identify priority areas on map	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Progress/status of map development; and (2) status of addressing identified priority areas	(1) Map and supporting documentation; and (2) Supporting documentation, as applicable	1/21/2010	
9		Procedures for locating priority areas with higher likelihood of illicit connections (continued on next page)	Locating areas with HSTSs	In 2006-2007, the City Health Department identified and field-verified a total of 99 HSTS-properties within the City (see "HSTS list" and "HSTS map" BMPs). All 99 HSTS-properties in the City of Canton are "on-lot HSTSs" (there are no "off-lot HSTS" in the City). The Health Department may utilize inspection reports or other data submitted or obtained from reliable sources to determine compliance. HSTS monitoring is typically reactive, based on odor and visual complaints from residents or city employees. The Health Department has the authority to inspect any HSTS, sample the effluent, or take any other steps deemed necessary to insure proper compliance with applicable portions of the Ohio Administrative Code and Canton City Health Code.	BMP assists in satisfying Part III.B.3.i.iv.1.	"Preventing Septic System Failure" and "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination)	Yes	Health: Environmental Health Director	No	Locate all properties with HSTS (see "HSTS list" and "HSTS Map" BMPs)					1/21/2010
10			Monitoring sewer connections	Chapters 909 and 961 of City Codified Ordinances contain provisions for required permits, fees, and inspections for excavations within City right-of-way. Therefore, any time a person wants to install, connect, or modify a storm or sanitary sewer, a permit must be obtained from and the work inspected by the City Engineering Department. Suspect illicit sanitary connections to the MS4 may arise due to complaints of foul odors or other sewage evidence in the MS4, evidence of dry-weather flows, evidence of unpermitted work performed on City-owned sewers, routine MS4 inspections, etc. Upon identifying such illicit connections, illicit discharge protocols are followed. All illicit connections are considered priorities.	BMP assists in satisfying Part III.B.3.i.iv.1.	"Reducing the Occurrence of SSOs" and "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination)	Yes	Engineering: City Engineer	No	Continue to require permits for sanitary and storm sewer installations, connections, and modifications	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Indication if permits continue to be required	Supporting documentation, as applicable	3/24/2010	

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)

(Permit Part III.B.3.) Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination

"Storm Water Illicit Discharge Detection and Elimination (IDDE) Program": Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

Storm Water Illicit Discharge Detection and Elimination (SSO, I&I, and other non-sanitary flows)															
[1] BMP #	[2] Permit Requirement		Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.a. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.e. [7] Legal Authority to Implement?	Part III.A.1.d. [8] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [9] Agreement Needed?	Part III.A.1.c. [10] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [11] Rationale for Measurable Goal(s) Selection	Part III.B.3.k. [12] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [13] Information for Responsible Position(s) to Maintain for Audits		
11	Plan to Detect and Eliminate Non-Storm Water/Illicit Discharges to MS4 (continued from previous page and on next page):		Procedures for locating priority areas with higher likelihood of illicit connections (continued from previous page)	Sanitary sewer overflows (SSOs) are releases of raw sewage from a separate sanitary sewer system before it has reached a treatment facility. SSOs occur when the flow into the system exceeds the design capacity of the conveyance system, resulting in discharges into basements, streets, and streams. Sewage overflowing from a manhole is a common SSO, and it frequently results in untreated sewage flowing into an MS4 or stream. SSOs can also occur due to the presence of too much inflow and infiltration (I&I) of storm water, ground water, and/or other non-sanitary flows. The City Collection Systems (Sewer) Department routinely televises sanitary sewer mains and checks for high levels of I&I. Areas with sanitary sewers having high levels of I&I and/or illegal/illicit connections are considered priorities. These areas are further evaluated and investigated to resolve such problems so that SSOs do not occur resulting in illicit discharges into the MS4.	BMP assists in satisfying Part III.B.3.i.iv.1.	"Reducing the Occurrence of SSOs" and "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination)	Yes	Collection Systems (Sewer): Superintendent	No	Continue to routinely televises sanitary sewers for potential I&I and illegal/illicit connections.	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Summary of footage of sanitary sewers televised, status of high I&I and/or illegal/illicit connections found	Supporting documentation, as applicable	3/8/2010	
12			Procedures for tracing the source of illicit discharges, including specific techniques (continued on next page):	Televising storm sewers	Upon investigation of known or suspected illicit discharges into the MS4, when the source of the discharge is unknown and when other investigative procedures (visual inspections) are inconclusive, the Collection Systems (Sewer) Department can televise suspect sewers as an inspection practice to attempt to trace the source of discharges and/or verify conditions and connectivity of lines. Using either a stick camera (stationary) or mobile sewer video camera and video recording equipment, the City has been televising storm and sanitary sewers since 1996. Depending on findings, certain decisions can be made if further actions are needed to reduce floatables and other pollutants to and from the MS4.	BMP assists in satisfying Part III.B.3.i.iv.2. and Part III.B.6.d.iii.1.	"Reducing the Occurrence of SSOs" and "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination)	Yes	Collection Systems (Sewer): Superintendent	No	Continue to televises suspect storm sewers as deemed necessary	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Summary of footage of storm sewers televised, status of findings (as applicable)	Supporting documentation, as applicable	2/2/2010
13				Sewer dye-testing	Upon investigation of known or suspected illicit discharges into the MS4, when the source of the illicit discharge is unknown and when other investigative procedures (visual inspections) are inconclusive, the City Health Department can dye test storm and sanitary sewers as an inspection procedure to attempt to trace the source of the illicit discharges and verify connectivity of drains to storm or sanitary sewers. In accordance with illicit discharge protocols, the involvement of the City Health Department to provide dye-testing is typically initiated by the Fire Department or City Engineering Department. Depending on findings, certain decisions can be made if further actions are needed to reduce floatables and other pollutants to and from the MS4.	BMP assists in satisfying Part III.B.3.i.iv.2. and Part III.B.6.d.iii.1.	"Reducing the Occurrence of SSOs" and "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination)	Yes	Health: Environmental Health Director	No	Continue to utilize dye testing procedures and techniques, as necessary	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Summary of locations and dates where dye-testing techniques are being used; summary of findings, as applicable	Supporting documentation, as applicable	1/21/2010
14			Procedures for removing the source of illicit discharges	Procedures for removing the source of illicit discharges	If the source of an illicit discharge into the MS4 is confirmed, the abatement of the illicit discharge requires removal of the source, and the source can be traced to a responsible party, Chapter 961 of Part 9 of the City Codified Ordinances provides provisions for the issuance of a Notice of Violation to the responsible party. The Notice of Violation sets forth a deadline within which such remediation (removal) or restoration must be completed. Said Notice further advises that, should the responsible party fail to remediate (remove) or restore within the established deadline, the City has the right to perform said remediation (removal) or restoration, assess the costs of such work to the responsible person, party, or entity, and initiate any other legal action and administrative penalty for enforcement in accordance with the provisions of Chapter 961.	Required per Part III.B.3.i.iv.3.	"Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination)	Yes	Engineering: City Engineer	No	Continue to adhere to illicit discharge removal provisions within Chapter 961 of the City Codified Ordinances	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Summary of locations where sources of illicit discharges are removed; dates; total number of removals	Supporting documentation, as applicable	1/21/2010
15	Procedures for program plan evaluation and assessment	Storm Water IDDE Program evaluation and assessment	It is vital to the success of this MCM that the City's Storm Water IDDE Program is routinely evaluated and assessed by appropriate personnel and modified accordingly as needed. Key departments involved in this BMP are Engineering, Collection Systems (Sewer), Fire Department, and Health.	Required per Part III.B.3.i.iv.4.	"Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination)	Yes	Engineering: City Engineer	No	Conduct annual meeting with key personnel to evaluate and assess IDDE Program; revise IDDE Program as needed	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Meeting date; personnel in attendance; relevant revisions	Copy of meeting agenda; list of attendees; supporting documentation of IDDE Program revisions, as applicable	1/21/2010		

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)														Revised
(Permit Part III.B.3.) Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination														
"Storm Water Illicit Discharge Detection and Elimination (IDDE) Program": Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements														
[1] BMP #	[2] Permit Requirement		Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.a. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.e. [7] Legal Authority to Implement?	Part III.A.1.d. [8] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [9] Agreement Needed?	Part III.A.1.c. [10] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [11] Rationale for Measurable Goal(s) Selection	Part III.B.3.k. [12] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [13] Information for Responsible Position(s) to Maintain for Audits	
16	Plan to Detect and Eliminate Non-Storm Water/Illicit Discharges to MS4 (continued from previous page)	Addressing certain categories of non-storm water discharges/ flows identified as significant contributors of pollutants to MS4	Addressing non-storm water discharges identified as significant contributors of pollutants to MS4	The City of Canton is authorized to discharge those non-storm water sources described in permit Part I.B.3.b. provided that Ohio EPA has not determined, and notified the City in writing, that such sources are substantial contributors of pollutants to Canton's MS4. Upon recognition of any other non-storm water discharges/flows that do not fit within the referenced categories, the City of Canton is to evaluate such discharge and determine if they are significant contributors of pollutants to its MS4. The City Health Department may be utilized, as necessary, to provide appropriate testing of such discharges for proper evaluation. If determined to be a significant contributor of pollutants to the MS4, the City of Canton is to address such discharges as illicit discharges in accordance with illicit discharge protocol.	Required per Part III.B.3.g.	"Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination)	Yes	Engineering: City Engineer	No	Identify such discharges and evaluate whether they should be addressed as illicit discharges, as necessary	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Types of such discharges to be addressed as illicit discharges, as necessary	Supporting documentation, as applicable	3/15/2010
17	Inform public employees, businesses, and general public of hazards associated with illegal discharges and improper disposal of waste		Illegal discharge and trash management education	This requirement is addressed under MCM #1. See "Illegal discharge and trash management education" and "Government employee training/ education to prevent and reduce storm water pollution from municipal operations" BMPs under MCM #1 for details.										1/21/2010
18	Development of list of occasional incidental non-storm water discharges <u>not</u> to be addressed as illicit discharges		List of non-storm water discharges not to be addressed as illicit discharges	The City of Canton is authorized to discharge those non-storm water sources described in permit Part I.B.3.b. provided that Ohio EPA has not determined, and notified the City in writing, that such sources are substantial contributors of pollutants to Canton's MS4. Upon recognition of any other non-storm water discharges/flows that do not fit within the referenced categories, the City of Canton is to evaluate such discharge and determine if they are significant contributors of pollutants to its MS4. The City Health Department may be utilized, as necessary, to provide appropriate testing of such discharges for proper evaluation. If determined to <u>not</u> be a significant contributor of pollutants to the MS4, the City of Canton is <u>not</u> to address such discharges as illicit discharges. The City Engineer is to maintain a list of such "allowable" non-storm water discharges. Due to the nature of this BMP, such list will be continually evolving, as necessary.	Optional per Part III.B.3.h.	"Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination)	Yes	Engineering: City Engineer	No	Maintain a list of such "allowable" discharges, as necessary.	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Descriptions of "allowable" non-storm water discharges, as applicable	List and supporting documentation, as applicable	1/21/2010

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)			Revised
(Permit Part III.B.4.) Minimum Control Measure (MCM) #4: Construction Site Storm Water Runoff Control			
MCM Permit Requirement(s)			
Part III.B.4.a.	[City of Canton] shall develop, implement, and enforce a program to reduce pollutants in any storm water runoff to [City of Canton's] MS4 from construction activities that result in land disturbance of greater than or equal to one acre. Reduction of pollutants in storm water discharges from construction activity disturbing less than one acre shall be included in [City of Canton's] program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. If Ohio EPA waives requirements for storm water discharges associated with small construction from a specific site, [City of Canton] is not required to enforce its program to reduce pollutant discharges from such site(s). [City of Canton's] program shall include the development and implementation of, at a minimum:		
Part III.B.4.a.i.	An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law. [City of Canton's] ordinance or other regulatory mechanism shall, at a minimum, be equivalent with the technical requirements set forth in the Ohio NPDES General Storm Water Permit(s) for Construction Activities applicable to [City of Canton's] permit area which have been issued at the time of issuance of this permit. This would include the following Ohio EPA NPDES General Storm Water Permits for Construction Activities: OHC000003, OHC000001, and OHCO00001. If [City of Canton] initially had coverage under a previous version of this permit [City of Canton] shall revise [City of Canton's] ordinance or other regulatory mechanism, if needed, within two years of when [City of Canton's] coverage under this permit was granted [6/4/09];		
Part III.B.4.a.ii.	Requirements for construction site operators to implement appropriate erosion and sediment control BMPs;		
Part III.B.4.a.iii.	Requirements for construction site operators to control waste such as, but not limited to, discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;		
Part III.B.4.a.iv.	Procedures for storm water pollution prevention plan review which incorporate consideration of potential water quality impacts;		
Part III.B.4.a.v.	Procedures for receipt and consideration of information submitted by the public; and		
Part III.B.4.a.vi.	Procedures for site inspection and enforcement of control measures.		
Decision Process (Rationale Statement) for Development of Construction Site Storm Water Control Program			
Part III.B.4.b.	[City of Canton] shall document [its] decision process for the development of a construction site storm water control program. [City of Canton's] rationale statement shall address both [City of Canton's] overall construction site storm water control program and the individual BMPs, measurable goals, and responsible person for [City of Canton's] program.		
Response:	The City of Canton supports EPA's assessment that polluted stormwater runoff from construction sites often flows to MS4s and ultimately is discharged into local rivers and streams. Pollutants commonly discharged from construction sites include: sediment, solid and sanitary wastes, phosphorous (fertilizer), nitrogen (fertilizer), pesticides, oil and grease, concrete truck washout, construction chemicals, and construction debris. The resulting of pollutants from construction sites can cause physical, chemical, and biological harm to our nation's waters. See USEPA's Stormwater Phase II Final Rule Fact Sheet Series at http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm for further information on the NPDES Phase II Small MS4 Storm Water Program and the associated Minimum Control Measures. The City of Canton is to implement the BMPs described below as part of its Construction Site Storm Water Runoff Control Program to reduce pollutants in stormwater runoff to its MS4 from construction activities that result in land disturbances of greater than or equal to one acre. The identified BMPs are those that the City believes are needed to meet permit requirements and/or expectations. See "Construction Site Stormwater Runoff Control" on USEPA's National Menu of Stormwater Best Management Practices at http://cfpub.epa.gov/npdes/stormwater/menuofbmps/ for further BMP guidance and information.		1/21/2010
Part III.B.4.b.	The rationale statement shall include the following information, at a minimum:		
Part III.B.4.b.i.	The mechanism (ordinance or other regulatory mechanism) [City of Canton] will use to require erosion and sediment controls at construction sites and why [City of Canton] chose that mechanism. If [City of Canton] needs to develop this mechanism, describe [City of Canton's] plan and a schedule to do so. If [City of Canton's] ordinance or other regulatory mechanism is already developed, include a copy of the relevant sections with [City of Canton's] SWMP description;		
Response:	The City of Canton is to utilize an ordinance as the regulatory mechanism to require erosion and sediment controls at construction sites. Ordinances are the typical legislative mechanisms for cities to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City ordinances were used to satisfy the regulatory intent of this minimum control measure. In 2009, a new storm water management ordinance was adopted. See "Storm Water Management Ordinance" BMP below for further details.		1/21/2010
Part III.B.4.b.ii.	[City of Canton's] plan to ensure compliance with [its] erosion and sediment control regulatory mechanism, including the sanctions and enforcement mechanisms [City of Canton] will use to ensure compliance. Describe [City of Canton's] procedures for when [City of Canton] will use certain sanctions. Possible sanctions include non-monetary penalties (such as stop-work orders), fines, bonding requirements, and/or permit denials for non-compliance.		
Response:	The City of Canton's "Storm Water Management Ordinance" includes sanctions and enforcement mechanisms to ensure compliance. The ordinance provides for plan denials, Notices Of Violations, Stop Work Orders, injunctive relief, civil proceedings, fines, etc. to be utilized accordingly. See "SWP3 reviews" and "Construction site inspections and enforcement" BMPs below for further details.		1/21/2010
Part III.B.4.b.iii.	[City of Canton's] requirements for construction site operators to implement appropriate erosion and sediment control BMPs and control waste at construction sites that may cause adverse impacts to water quality. Such waste includes, but is not limited to, discarded building materials, concrete truck washouts, chemicals, litter, and sanitary waste;		
Response:	The City of Canton requires construction site operators to implement appropriate erosion and sediment control BMPs and control waste (discarded building materials, concrete truck washouts, chemicals, litter, and sanitary waste, etc.) at construction sites that may cause adverse impacts to water quality. See "Construction site storm water runoff quality controls" BMP below for further details.		1/21/2010
Part III.B.4.b.iv.	[City of Canton's] procedures for pre-construction storm water pollution prevention plan review which incorporate consideration of potential water quality impacts. Describe the estimated number and percentage of sites that will have pre-construction site plans reviewed;		
Response:	Through a Memorandum Of Understanding between the City of Canton and the Stark SWCD, procedures for pre-construction SWP3 reviews which incorporate consideration of potential water quality impacts are established. 100% of applicable proposed land disturbance activities are required to have SWP3s submitted, reviewed, and approved prior to construction activities taking place. The number of overall annual site plan reviews is difficult to estimate since it is highly dependent on the development economy. See "SWP3 reviews" BMP below for further details.		1/21/2010
Part III.B.4.b.v.	[City of Canton's] procedures for receipt and consideration of information submitted by the public. Consider coordinating this requirement with [City of Canton's] public education program;		
Response:	The City of Canton has established procedures for the consideration of information submitted by the public. See "Procedures for receipt and consideration of information submitted by public" BMP below for further details.		1/21/2010
Part III.B.4.b.vi.	[City of Canton's] procedures for site inspection and enforcement of control measures, including how [City of Canton] will prioritize sites for inspection;		
Response:	The City of Canton has established procedures for site inspection and enforcement of control measures, including how sites are prioritized for inspection. See "Construction site inspections and enforcement" BMP below for further details.		1/21/2010
Part III.B.4.b.vii.	Who is responsible for overall management and implementation of [City of Canton's] construction site storm water control program and, if different, who is responsible for each of the BMPs identified for this program; and		
Response:	Even though the Assistant City Engineer in the Civil Division of the Engineering Department is the primary contact for the SWMP and responsible for preparing annual reports, the Service Director is responsible for the overall management and implementation of the City of Canton's construction site storm water control program. However, each BMP listed below identifies the particular City department or entity and position primarily responsible for the implementation of the respective BMP. Each responsible position is to maintain all records of supporting information for respective BMP implementation.		1/21/2010
Part III.B.4.b.viii.	Describe how [City of Canton] will evaluate the success of this minimum control measure, including how [City of Canton] selected the measurable goals for each of the BMPs.		
Response:	In time, the City of Canton is to measure the success of this MCM by determining if the measurable goals for the BMPs are met (through annual reports) as well as by implementing the BMPs in accordance with applicable recommendations as identified on USEPA's National Menu of Stormwater Best Management Practices. Each identified responsible position is to provide the respective information for Annual Reports to Chris Barnes of the City Engineering Department by February 15th, annually. Ideally, the success of the City's SWMP may be evaluated based on the results of field monitoring in the Nimishillen Creek and/or other indicators. Each BMP listed below describes an associated measurable goal or goals. The goals were selected based on some practical and/or quantifiable (if possible) aspect of their implementation and the ease of measuring such aspect which provides simple indication of whether the BMP is successfully implemented.		1/21/2010
Performance Standards			
Part III.B.4.c.	[City of Canton's] construction site storm water control program shall include pre-construction storm water pollution prevention plan review of all projects from construction activities that result in a land disturbance of greater than or equal to one acre. To ensure compliance, these applicable sites shall be initially inspected. The frequency of follow-up inspections shall be on a monthly basis unless [City of Canton] documents procedures for prioritizing inspections such as location to waterway, amount of disturbed area, compliance of site, etc. [Since the City of Canton] initially had coverage under a previous version of this permit, [City of Canton] shall revise [its] program to satisfy these performance standards, if needed, within two years of when coverage under the current general permit was granted [6/4/09].		
Annual Reporting			
Part III.B.4.d.	Annual Reports shall document the following: (1) number of applicable sites in jurisdiction, (2) number of pre-construction storm water pollution prevention plan reviews performed, (3) number and frequency of site inspections, (4) number of violation letters issued, (5) number of enforcement actions taken, and (6) number of complaints received and number followed up on.		

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)													Revised
(Permit Part III.B.4.) Minimum Control Measure (MCM) #4: Construction Site Storm Water Runoff Control													
"Construction Site Storm Water Control Program": Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements													
[1] BMP #	[2] Permit Requirement	Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.e. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.b. [7] Legal Authority to Implement?	Part III.A.1.d. [8] Responsible Entity/ City Dept(s); Position(s)	Part III.C. [9] Agreement Needed?	Part III.A.1.c. [10] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [11] Rationale for Measurable Goal(s) Selection	Part III.B.4.d. [12] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [13] Information for Responsible Position(s) to Maintain for Audits	
1	Ordinance or other regulatory mechanism requiring construction site erosion, sediment, and waste controls	Storm water management ordinance	In 2009 the City adopted a "Storm Water Management" ordinance (Chapter 961 of Part Nine - Streets, Utilities, and Public Services Code) which is intended to consolidate provisions within existing ordinances and satisfy permit requirements that were not addressed by existing City ordinances. A "City of Canton Storm Water Management Manual" was adopted as part of the ordinance and includes provisions for the required construction site storm water runoff quality controls for applicable sites. The ordinance requires, at a minimum, the minimum requirements of Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 as well as requirements in the Stark SWCD's Storm Water Quality Regulations. Appropriate sanctions to ensure compliance are also provided. Refer to Chapter 961 "Storm Water Management" ordinance and the "City of Canton Storm Water Management Manual" for further details.	Required per Part III.B.4.a.i.	"Local Ordinances for Construction Site Stormwater Runoff Control" (under USEPA MCM#4: Construction Site Stormwater Runoff Control)	Yes	Engineering: City Engineer	No	(1) Continue to use ordinance to require construction site storm water runoff quality controls on applicable sites; and (2) ensure ordinance meets minimum requirements of current applicable NPDES permits	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if respective controls are required by ordinance; and (2) indication if ordinance is in conformance with current applicable NPDES permits; summary of any relevant revisions to ordinance	(1) Copy of current ordinance; and (2) supporting documentation, as necessary	3/15/2010 1/21/2010
2	Requirements for construction site erosion, sediment, and waste control	Construction site storm water runoff quality controls	As described in the "Ordinance requiring construction site storm water runoff quality controls" BMP, the "City of Canton Storm Water Management Manual" requires, at a minimum, the minimum requirements of Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 for construction site storm water runoff quality controls, including erosion, sediment, and waste control. These requirements are to be applicable to sites in which there is proposed to be 1 acre or more of land disturbance as well as to sites in which there is proposed to be less than 1 acre of land disturbance but part of a larger common plan of development that will disturb 1 acre or more of land. Refer to Chapter 961 "Storm Water Management" ordinance and the "City of Canton Storm Water Management Manual" for further details.	Required per Part III.B.4.a.ii-iii.	(Refer to all Construction Site Stormwater Runoff Control BMPs on USEPA's National Menu of Best Management Practices)	Yes	Engineering: City Engineer	No	Ensure construction site erosion, sediment, and waste controls are implemented in accordance with current applicable NPDES permits	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Indication if construction site erosion, sediment, and waste controls are implemented in accordance with current applicable NPDES permits	Copy of current ordinance	1/21/2010
3	Procedures for Storm Water Pollution Prevention Plan (SWP3) review which incorporate consideration of potential water quality impacts	SWP3 reviews	Since 2007, the City and Stark SWCD have an active Memorandum of Understanding (MOU) which describes the role of Stark SWCD in reviewing applicable sites for compliance with Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 and Stark SWCD's Storm Water Quality Regulations. This includes reviewing plans for storm water quality management of both construction site runoff and post-construction runoff. As such, no applicable site plan is approved without SWP3s being first approved by Stark SWCD. Refer to Chapter 961 "Storm Water Management" ordinance and the "City of Canton Storm Water Management Manual" for further details.	Required per Part III.B.4.a.iv.	"Construction Phase Plan Review" (under USEPA MCM#4: Construction Site Stormwater Runoff Control)	Yes	Stark SWCD: Urban Resource Coordinator	Yes	(1) Renew MOU between City and Stark SWCD annually; and (2) ensure SWP3s are developed and submitted for applicable sites; and (3) continue to utilize Stark SWCD to review applicable SWP3s	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication of MOU renewal; and (2) indication if SWP3s are developed and submitted for applicable sites; and (3) # of applicable sites in jurisdiction; # of SWP3s reviewed	(1) Copy of MOU and payment verification; and (2),(3) SWP3 review files and supporting documentation, as applicable; and	1/21/2010
4	Procedures for receipt and consideration of information submitted by public	Procedures for receipt and consideration of information submitted by public	The public is welcomed to attend regular City Council meetings, contact the City Building Department, any other department, or the Stark SWCD (330-830-7700 ext. 5) as necessary to relay questions and concerns about current or proposed construction activities within the City. The City does its best to answer questions and consider information submitted by the public. Since 2007, the City and Stark SWCD have an active Memorandum of Understanding (MOU) which describes the role of Stark SWCD in addressing public complaints pertaining to MCM 4 & 5 by site investigation, letter, or phone call. Most of the information submitted by the public relating to construction activities is in regards to construction complaints, so the Stark SWCD is typically the entity that is involved in addressing the respective information. If Stark SWCD is unable to address the issue, the appropriate City representative becomes involved.	Required per Part III.B.4.a.v.	"Municipal Construction Inspection Program" (under USEPA MCM#4: Construction Site Stormwater Runoff Control)	Yes	Stark SWCD: Urban Resource Coordinator	Yes	(1) Renew MOU between City and Stark SWCD annually; and (2) continue to receive and consider information submitted by public, as applicable; and (3) continue to investigate and follow-up on applicable construction activity complaints	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication of MOU renewal; and (2) # of construction activity complaints received; and (3) # of construction activity complaints followed up on	(1) Copy of MOU and payment verification; and (2),(3) supporting documentation describing date, location, issue, actions taken, etc., as applicable	1/21/2010
5	Procedures for site inspection and enforcement of control measures	Construction site inspections and enforcement	Since 2007, the City and Stark SWCD have an active Memorandum of Understanding (MOU) which describes the role of Stark SWCD in regularly inspecting all applicable sites for implementation of appropriate construction site and post-construction storm water quality BMPs as well as sending copies of all inspection reports to the City of Canton and reporting all non-compliant sites for appropriate enforcement actions by the City via Chapter 961 "Storm Water Management" of the City Codified Ordinances. All applicable activities are considered priorities until a Notice Of Termination is filed with Ohio EPA and therefore all such sites are inspected regularly. Chapter 961 contains all necessary inspection, enforcement, and penalty provisions necessary to satisfy the permit requirements. Refer to Chapter 961 "Storm Water Management" ordinance and the "City of Canton Storm Water Management Manual" for further details.	Required per Part III.B.4.a.vi.	"Municipal Construction Inspection Program" and "Local Ordinances for Construction Site Stormwater Runoff Control" (under USEPA MCM#4: Construction Site Stormwater Runoff Control)	Yes	Stark SWCD: Urban Resource Coordinator	Yes	(1) Renew MOU between City and Stark SWCD annually; and (2) continue to inspect applicable construction sites; and (3) notify City of Canton for enforcement of violations, as applicable	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication of MOU renewal; and (2) # and frequency of site inspections; and (3) # of violation letters issued and corresponding status	(1) Copy of MOU and payment verification; and (2) copies of site inspection letters; and (3) copies of notifications to City, as applicable	1/21/2010

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)			Revised
(Part III.B.5.) Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment			
MCM Permit Requirement(s)			
Part III.B.5.a.	[City of Canton] shall develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into its MS4. [City of Canton's] program shall ensure that controls are in place that will prevent or minimize water quality impacts;		
Part III.B.5.b.	[City of Canton] shall develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for [City of Canton].		
Part III.B.5.c.	[City of Canton] shall use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law. [City of Canton's] ordinance or other regulatory mechanism shall, at a minimum, be equivalent with the technical requirements set forth in the Ohio EPA NPDES General Storm Water Permit(s) for Construction Activities applicable for [City of Canton] permit area which have been issued at the time of issuance of this permit. This would include the following Ohio EPA NPDES General Storm Water Permits for Construction Activities: OHC000003, OHCD00001, and OHCO00001. [Since City of Canton] initially had coverage under a previous version of this permit, [City of Canton] shall revise [its] ordinance or other regulatory mechanism, if needed, within two years of when [City of Canton's] coverage under this general permit was granted [6/4/09].		----
Part III.B.5.d.	[City of Canton] shall ensure adequate long-term operation and maintenance of BMPs.		
Decision Process (Rationale Statement) for Development of Post-Construction SWMP			
Part III.B.5.e.	[City of Canton] shall document [its] decision process for the development of a post-construction SWMP. [City of Canton's] rationale statement shall address both [its] overall post-construction SWMP and the individual BMPs, measurable goals, and responsible persons for [City of Canton's] program.		
Response:	The City of Canton supports EPA's assessment that post-construction stormwater management in areas undergoing new development or redevelopment is necessary because runoff from these areas has been shown to significantly affect receiving waterbodies. See USEPA's Stormwater Phase II Final Rule Fact Sheet Series at http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm for further information on the NPDES Phase II Small MS4 Storm Water Program and the associated Minimum Control Measures. The City of Canton is to implement the BMPs described below as part of its Post-Construction Storm Water Management Program to reduce pollutants in post-construction runoff to its MS4 from new development and redevelopment projects that result in land disturbances of greater than or equal to one acre. The identified BMPs are those that the City believes are needed to meet permit requirements and/or expectations. See "Post-Construction Stormwater Management in New Development and Redevelopment" on USEPA's National Menu of Stormwater Best Management Practices at http://cfpub.epa.gov/npdes/stormwater/menuofbmps/ for further BMP guidance and information.		1/21/2010
Part III.B.5.e.	The rationale statement shall include the following information, at a minimum:		----
Part III.B.5.e.i.	[City of Canton's] program to address storm water runoff from new development and redevelopment projects. Include in this description any specific priority areas for this program.		
Response:	The City of Canton is to implement the requirements of this MCM so that both the post-construction quantity and quality of storm water runoff from new development and redevelopment projects is appropriately managed. Post-construction storm water quality management is to apply to all sites disturbing 1 acre or more while post-construction storm water quantity management is to be evaluated and applied accordingly to all sites requiring the submission of a site plan per the Planning and Zoning Code. Detailed standards, specifications, and requirements for post-construction storm water quantity and quality management are to be provided via "Storm water management ordinance" BMP below.		1/21/2010
Part III.B.5.e.ii.	How [City of Canton's] program will be specifically tailored for [City of Canton's] local community, minimize water quality impacts, and attempt to maintain pre-development runoff conditions.		----
Response:	Until further regulation is mandated by the EPA requiring specific BMPs or controls for specific pollutants, the City of Canton believes that by implementing the requirements of this MCM, the City's program is tailored for the local community. Through the use of applicable local master plans, comprehensive plans, zoning ordinances, the involvement of the Stark SWCD in plan review and site inspections, local storm water management requirements, requirements of the Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003, and discretion by City and SWCD staff for non-standard circumstances, improved post-construction water quality is promoted in many ways thus attempting to minimize water quality impacts and maintain pre-development runoff conditions.		1/21/2010
Part III.B.5.e.iii.	Any non-structural BMPs in [City of Canton's] program, including, as appropriate: policies and ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space (including a dedicated funding source for open space acquisition), provide buffers along sensitive water bodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation; policies or ordinances that encourage infill development in higher density urban areas, and areas with existing storm sewer infrastructure; education programs for developers and the public about project designs that minimize water quality impacts; and other measures such as minimization of the percentage of impervious area after development, use of measures to minimize directly connected impervious areas, and source control measures often thought of as good housekeeping, preventative maintenance, and spill prevention.		----
Response:	The City of Canton implements various non-structural BMPs that meet the above descriptions. See all non-structural BMPs and strategies below for further details.		1/21/2010
Part III.B.5.e.iv.	Any structural BMPs in [City of Canton's] program, including, as appropriate: storage practices such as wet ponds and extended-detention outlet structures; filtration practices such as grassed swales, bioretention cells, sand filters, and filter strips; and infiltration practices such as infiltration basins and infiltration trenches.		----
Response:	The "City of Canton Storm Water Management Manual" (part of the City's "Storm Water Management" ordinance) contains provisions for structural BMPs in accordance with requirements of the Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 at a minimum and supports the use of any such practices as long as they are approved for use by Ohio EPA. See all structural BMPs and strategies below for further details.		1/21/2010
Part III.B.5.e.v.	The mechanism (ordinance or other regulatory mechanisms) [City of Canton] will use to address post-construction runoff from new developments and redevelopments and why [City of Canton] chose the mechanism(s). If [City of Canton] needs to develop a mechanism, describe in [City of Canton's] plan and a schedule to do so. If [City of Canton's] ordinance or regulatory mechanism is already developed, include a copy of the relevant sections with [City of Canton's] program.		----
Response:	The City of Canton is to utilize an ordinance as the regulatory mechanism to address post-construction runoff from new developments and redevelopments. Ordinances are the typical legislative mechanisms for cities to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City ordinances were used to satisfy the regulatory intent of this minimum control measure. In 2009, a new storm water management ordinance was adopted. See "Storm water management ordinance" BMP below for further details.		1/21/2010
Part III.B.5.e.vi.	How [City of Canton] will ensure long-term operation and maintenance (O&M) of [its] selected BMPs. Options to help ensure that future O&M responsibilities are clearly identified include an agreement between [City of Canton] and another party such as the post-development landowners or regional authorities.		----
Response:	The City of Canton is to require Long Term Maintenance Plans to be developed for applicable post-construction BMPs and ensure easement requirements and inspection and enforcement provisions are provided within its "Storm Water Management" ordinance to help ensure that long-term operation and maintenance occurs as appropriate. See "Long Term Maintenance Plans" BMP below for further details.		1/21/2010
Part III.B.5.e.vii.	Who is responsible for overall management and implementation of [City of Canton's] post-construction SWMP and, if different, who is responsible for each of the BMPs identified for this program.		----
Response:	Even though the Assistant City Engineer in the Civil Division of the Engineering Department is the primary contact for the SWMP and responsible for preparing annual reports, the Service Director is responsible for the overall management and implementation of the City of Canton's post-construction SWMP. However, each BMP listed below identifies the particular City department or entity and position primarily responsible for the implementation of the respective BMP. Each responsible position is to maintain all records of supporting information for respective BMP implementation.		1/21/2010
Part III.B.5.e.viii.	How [City of Canton's] program will evaluate the success of this minimum measure, including how [City of Canton] selected the measurable goals for each of the BMPs.		----
Response:	In time, the City of Canton is to measure the success of this MCM by determining if the measurable goals for the BMPs are met (through annual reports) as well as by implementing the BMPs in accordance with applicable recommendations as identified on USEPA's National Menu of Stormwater Best Management Practices. Each identified responsible position is to provide the respective information for Annual Reports to Chris Barnes of the City Engineering Department by February 15th, annually. Ideally, the success of the City's SWMP may be evaluated based on the results of field monitoring in the Nimishillen Creek and/or other indicators. Each BMP listed below describes an associated measurable goal or goals. The goals were selected based on some practical and/or quantifiable (if possible) aspect of their implementation and the ease of measuring such aspect which provides simple indication of whether the BMP is successfully		1/21/2010
Performance Standards			
Part III.B.5.f.	[City of Canton's] post-construction SWMP shall include pre-construction storm water pollution prevention plan reviews of all projects from construction activities that result in a land disturbance of greater than or equal to one acre to ensure that required controls are designed per requirements. These applicable sites shall be inspected to ensure that controls are installed per requirements. [City of Canton's] post-construction SWMP shall also ensure that long-term operation and maintenance (O&M) plans are developed and agreements are in place for all applicable sites. [Since the City of Canton] initially had coverage under a previous version of this permit, [City of Canton] shall revise [its] program satisfy these performance standards, if needed, within two years of when [City of Canton's] coverage under the current general permit was granted [6/4/09].		----
Annual Reporting			
Part III.B.5.g.	Annual Reports shall document the following: (1) number of applicable sites in jurisdiction requiring post-construction controls, (2) number of pre-construction storm water pollution prevention plan reviews performed, (3) number of inspections performed to ensure post-construction practices were built as per requirements, and (4) number of long-term operation and maintenance (O&M) plans developed and agreements in place.		----

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)															Revised
(Part III.B.5.) Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment															
"Post-Construction Storm Water Management Program (SWMP)": Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements															
[1] BMP #	[2] Permit Requirement	Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.e. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.b. [7] Legal Authority to Implement?	Part III.A.1.d. [8] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [9] Agreement Needed?	Part III.A.1.c. [10] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [11] Rationale for Measurable Goal(s) Selection	Part III.B.5.g. [12] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [13] Information for Responsible Position(s) to Maintain for Audits			
1	Ordinance or Other Regulatory Mechanism Requiring Controls for Post-Construction Runoff from New Development and Redevelopment	Storm water management ordinance	In 2009 the City adopted a "Storm Water Management" ordinance (Chapter 961 of Part Nine - Streets, Utilities, and Public Services Code) which is intended to consolidate provisions within existing ordinances and satisfy permit requirements that were are not addressed by existing City ordinances. A "City of Canton Storm Water Management Manual" was adopted as part of the ordinance and includes provisions for the required controls for post-construction runoff from applicable new development and redevelopment sites. The ordinance requires, at a minimum, the minimum requirements of Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 as well as requirements in the Stark SWCD's Storm Water Quality Regulations. Appropriate sanctions to ensure compliance are also provided. Refer to Chapter 961 "Storm Water Management" ordinance and the "City of Canton Storm Water Management Manual" for further details.	Required per Part III.B.5.c.	"Ordinances for Post-Construction Runoff" (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment)	Yes	Engineering: City Engineer	No	(1) Continue to use ordinance to require construction site storm water runoff quality controls on applicable sites; and (2) ensure ordinance meets minimum requirements of current applicable NPDES permits	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if respective controls are required by ordinance; and (2) indication if ordinance is in conformance with current applicable NPDES permits; summary of any relevant revisions to ordinance	(1) Copy of current ordinance; and (2) supporting documentation, as necessary	3/15/2010		
2	Non-Structural BMPs and Strategies (continued on next page)	As applicable, any policies and ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space (including a dedicated funding source for open space acquisition), provide buffers along sensitive water bodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation (continued on next page)	Policies and ordinances	The City's Planning & Zoning Code regulates development within all areas of the City in accordance with respective zone classifications. Chapter 1132 regulates the "Flood Hazard District" which generally restricts development adjacent to certain water bodies within the City. Chapter 1133 regulates the "Open Space District" which reserves such areas for public parks and recreation, and promotes the conservation of natural resources including land and water conservation and wildlife refuges, and agricultural areas. Other chapters regulate residential, business, and industrial districts, with certain requirements for building setbacks, maximum % of lot coverage, and minimum % of lot landscaping, as applicable. Chapter 1143 regulates "Planned Unit Development Districts", promoting "low impact development" philosophy such as the preservation and utilization of natural topography, geologic features, scenic vistas, green areas, requiring open spaces, minimizing impervious areas, preventing the disruption of natural drainage patterns, etc.	BMP assists in satisfying Part III.B.5.e.iii.	"Ordinances for Post-Construction Runoff", "Development Districts", and other BMPs (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment)	Yes	Building (Zoning): Zoning Inspector	No	(1) Continue to regulate "non-structural" measures as described through zoning ordinances; and (2) investigate the implementation of additional related "non-structural" measures, as applicable	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if described "non-structural" measures continue to be regulated; and (2) progress/status of implementation of any additional related "non-structural" measures	(1) Copy of current ordinances; and (2) supporting documentation, as applicable	1/21/2010	
3			Funding sources for open space acquisitions (continued on next page)	Parks Department funding	The City does not have a specific "dedicated funding source for open space acquisition". However, the City of Canton funds a Parks Department. The mission statement of the Canton Board of Park Commissioners states that the Board "is committed to maintaining and conserving diverse park, recreation, and open space opportunities by providing safe, adaptable, and environmentally conscious park areas". The Parks Department's natural function is to ensure that all City-owned properties under the responsibility of the Parks Department are in conformance with the mission statement. As funds and opportunities allow, open spaces can be acquired by the Park Board and developed or preserved as parks or other similar land use designations. Additional information can be found on the City's website at www.cantonohio.gov/parks .	BMP assists in satisfying Part III.B.5.e.iii.	"Protection of Natural Features", "Open Space Design", and other BMPs (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment)	Yes	Park: Director	No	Investigate opportunities to acquire open spaces and develop or preserve as parks or other similar land use designations	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Progress/status of any open space acquisitions or preservation	Supporting documentation, as applicable	1/21/2010
4				Community Development Block Grants	The City does not have a specific "dedicated funding source for open space acquisition". However, the City Development Department administers Community Development Block Grant (CDBG) funds. These funds are provided annually through federal programs and are intended to be used to serve low and moderate income areas within the City. Certain criteria must be met to utilize CDBG funds. Each CDBG funding opportunity is evaluated case-by-case. It is possible that certain CDBG funded projects may provide for the acquisition and preservation of open spaces and green spaces or for the acquisition and development of of open spaces into active recreation areas. Additional information can be found on the City's website at www.cantonohio.gov/development or by contacting the Development Department at 330-489-3344.	BMP assists in satisfying Part III.B.5.e.iii.	"Protection of Natural Features", "Open Space Design", and other BMPs (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment)	Yes	Development: Director	No	Investigate opportunities to utilize CDBG funds to acquire and preserve open spaces or develop them into recreational areas, as applicable	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Progress/status of utilizing CDBG funds to acquire and preserve open spaces or develop them into recreational areas, as applicable	Supporting documentation, as applicable	1/21/2010

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)															Revised			
(Part III.B.5.) Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment																		
"Post-Construction Storm Water Management Program (SWMP)": Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements																		
[1] BMP #	[2] Permit Requirement			Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.e. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.b. [7] Legal Authority to Implement?	Part III.A.1.d. [8] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [9] Agreement Needed?	Part III.A.1.c. [10] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [11] Rationale for Measurable Goal(s) Selection	Part III.B.5.g. [12] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [13] Information for Responsible Position(s) to Maintain for Audits				
5	Non-Structural BMPs and Strategies (continued from previous page)			As applicable, any policies and ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space, etc.....(continued from previous page)	Funding sources for open space acquisitions (continued from previous page)	Clean Ohio Green Space Conservation Program, etc.	The City does not have a specific "dedicated funding source for open space acquisition". However, funding opportunities from sources such as the Clean Ohio Green Space Conservation Program help to fund the preservation of open spaces, sensitive ecological areas, and stream corridors. Among other purposes, the Clean Ohio Green Space Conservation Program provides Clean Ohio Funds to projects that specifically: preserve streamside forests, natural stream channels, functioning floodplains, and other natural features of Ohio's waterways; support comprehensive open space planning; secure easements to protect stream corridors, etc. Additional information can be found on the Clean Ohio Fund website at www.clean.ohio.gov/GreenSpaceConservation . When appropriate, the City applies for and sometimes is awarded Clean Ohio Funds and/or other funds/grants for various projects and different applications. The City of Canton has utilized and hopes to continue to utilize these types of funds for such purposes.	BMP assists in satisfying Part III.B.5.e.iii.	"Protection of Natural Features", "Open Space Design", and other BMPs (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment)	Yes	Engineering: City Engineer	No	Investigate opportunities to utilize Clean Ohio Funds, etc. to acquire and preserve open spaces or develop them into recreational areas, as applicable	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Progress/status of utilizing Clean Ohio Funds to acquire and preserve open spaces or develop them into recreational areas, as applicable	Supporting documentation, as applicable	3/15/2010	
6				As applicable, any policies or ordinances that encourage infill development in higher density urban areas and areas with existing storm sewer infrastructure	Infill residential development ordinance	In 2005, the Canton City Planning Commission initiated an amendment to the Canton City Zoning Ordinance (Ordinance #217-2005) which allows for infill residential development. The ordinance provides that lots created prior to 1979 and held in separate ownership from adjoining and/or abutting property and less than the required lot area and width requirements of the applicable zoning district shall be deemed buildable lots if all of the following apply: the lot frontage is not less than 45 feet; the total area of the lot is not less than 4,500 square feet; and over 65% of the properties within 300 feet of the same street frontage of the lot are the same or less than the lot in question and are developed with a permitted residential structure. Any lot not meeting current zoning requirements for the district in which it is located and not meeting the requirements of the ordinance are deemed non-buildable unless granted a variance by the Board of Zoning Appeals. Most City streets serving higher density urban areas have existing storm sewers.	BMP assists in satisfying Part III.B.5.e.iii.	"Low Impact Development (LID) and Other Green Design Strategies", "Development Districts", and other BMPs (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment)	Yes	Development: Director	No	Continue to encourage infill residential development via ordinance	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Summary of any infill development occurring in accordance with ordinance	Supporting documentation summarizing location(s) of applicable infill development, as applicable	1/21/2010		
7				As applicable, any education programs for developers and the public about project designs that minimize water quality impacts	Storm water education for development community	This requirement is addressed under MCM #1. See "Storm water education for development community" BMP under MCM #1 for details.												1/21/2010
8				As applicable, any measures to minimize the percentage of impervious area after development and that minimize directly connected impervious areas	Zoning ordinances	The City's Planning & Zoning Code regulates various aspects of development within all areas of the City in accordance with respective zone classifications. Chapter 1132 regulates the "Flood Hazard District" which generally restricts development adjacent to certain water bodies within the City. Chapter 1133 regulates the "Open Space District" which reserves such areas for public parks and recreation, and promotes the conservation of natural resources including land and water conservation and wildlife refuges, and agricultural areas. Other chapters regulate residential, business, and industrial districts, with certain requirements for building setbacks, maximum % of lot coverage, and minimum % of lot landscaping, as applicable. Chapter 1143 regulates "Planned Unit Development Districts", promoting "low impact development" philosophy such as the preservation and utilization of natural topography, geologic features, scenic vistas, green areas, requiring open spaces, minimizing impervious areas, preventing the disruption of natural drainage patterns, etc.	BMP assists in satisfying Part III.B.5.e.iii	"Low Impact Development (LID) and Other Green Design Strategies", "Smart Growth", and other BMPs (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment)	Yes	Building (Zoning): Zoning Inspector	No	(1) Continue to regulate "non-structural" measures as described through zoning ordinances; and (2) investigate the implementation of additional related "non-structural" measures, as applicable	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if described "non-structural" measures continue to be regulated; and (2) progress/status of implementation of any additional related "non-structural" measures	(1) Copy of current ordinances; and (2) supporting documentation, as applicable	1/21/2010		
9	As applicable, any <u>source control measures</u> thought of as good housekeeping, preventative maintenance, and spill prevention	Source control measures	The City of Canton believes that such "source control measures" are addressed as necessary by Storm Water Pollution Prevention Plans via the requirements of Ohio EPA's General Storm Water Permit for Construction Activities as well as the required Long Term Maintenance Plans (see "Long Term Maintenance Plans" BMP) on applicable sites. As long as the minimum requirements within Ohio EPA's General Storm Water Permit for Construction Activities are met, such source control measures should be implemented as necessary on applicable sites.	Required per Part III.B.5.e.iii, as applicable.	"BMP Inspection and Maintenance" (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment)	Yes	Engineering: City Engineer	No	(1) Continue to require adherence to Ohio EPA's General Storm Water Permit for Construction Activities for applicable sites; and (2) investigate the implementation of additional related "non-structural" measures, as applicable	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication of required adherence to respective Ohio EPA Permit for applicable sites; and (2) progress/status of implementation of any additional related "non-structural" measures	(1) Copy of ordinance; and (2) supporting documentation, as applicable	1/21/2010					

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)													Revised
(Part III.B.5.) Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment													
"Post-Construction Storm Water Management Program (SWMP)": Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements													
[1] BMP #	[2] Permit Requirement	Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.e. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.b. [7] Legal Authority to Implement?	Part III.A.1.d. [8] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [9] Agreement Needed?	Part III.A.1.c. [10] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [11] Rationale for Measurable Goal(s) Selection	Part III.B.5.g. [12] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [13] Information for Responsible Position(s) to Maintain for Audits	
10	As applicable, any <u>storage practices</u> such as wet ponds and extended-detention outlet structures	Storage practices	Such practices are listed as available options to satisfy post-construction "structural" water quality BMP within Ohio EPA's General Storm Water Permit for Construction Activities. As applicable, the City of Canton requires adherence to Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 at a minimum and supports the use of any such practices as long as they are approved for use by Ohio EPA. Further explanation, including applicability, planning considerations, design criteria, maintenance, etc. of such practices is provided in the Ohio Department of Natural Resources' Rainwater and Land Development manual. Any related "alternative" practices not listed within Ohio EPA's General Storm Water Permit for Construction Activities must be approved by the City of Canton and/or Ohio EPA.	Required per Part III.B.5.e.iv, as applicable.	"Wet Ponds" and other retention/detention BMPs (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment)	Yes	Engineering: City Engineer	No	(1) Continue to require adherence to Ohio EPA's General Storm Water Permit for Construction Activities for applicable sites; and (2) investigate the implementation of additional related "non-structural" measures, as applicable	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication of required adherence to respective Ohio EPA Permit for applicable sites; and (2) progress/status of implementation of any additional related "non-structural" measures	(1) Copy of ordinance; and (2) supporting documentation, as applicable	3/15/2010 1/21/2010
11	As applicable, any <u>filtration practices</u> such as grassed swales, bioretention cells, sand filters, and filter strips	Filtration practices	Such practices are listed as available options to satisfy post-construction "structural" water quality BMP within Ohio EPA's General Storm Water Permit for Construction Activities. As applicable, the City of Canton requires adherence to Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 at a minimum and supports the use of any such practices as long as they are approved for use by Ohio EPA. Further explanation, including applicability, planning considerations, design criteria, maintenance, etc. of such practices is provided in the Ohio Department of Natural Resources' Rainwater and Land Development manual. Any related "alternative" practices not listed within Ohio EPA's General Storm Water Permit for Construction Activities must be approved by the City of Canton and/or Ohio EPA.	Required per Part III.B.5.e.iv, as applicable.	"Vegetated Filter Strip" and other filtration BMPs (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment)	Yes	Engineering: City Engineer	No	(1) Continue to require adherence to Ohio EPA's General Storm Water Permit for Construction Activities for applicable sites; and (2) investigate the implementation of additional related "non-structural" measures, as applicable	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication of required adherence to respective Ohio EPA Permit for applicable sites; and (2) progress/status of implementation of any additional related "non-structural" measures	(1) Copy of ordinance; and (2) supporting documentation, as applicable	1/21/2010
12	As applicable, any <u>infiltration practices</u> such as infiltration basins and infiltration trenches	Infiltration practices	Such practices are listed as available options to satisfy post-construction "structural" water quality BMP within Ohio EPA's General Storm Water Permit for Construction Activities. As applicable, the City of Canton requires adherence to Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 at a minimum and supports the use of any such practices as long as they are approved for use by Ohio EPA. Further explanation, including applicability, planning considerations, design criteria, maintenance, etc. of such practices is provided in the Ohio Department of Natural Resources' Rainwater and Land Development manual. Any related "alternative" practices not listed within Ohio EPA's General Storm Water Permit for Construction Activities must be approved by the City of Canton and/or Ohio EPA.	Required per Part III.B.5.e.iv, as applicable.	"Infiltration Trench" and other infiltration BMPs (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment)	Yes	Engineering: City Engineer	No	(1) Continue to require adherence to Ohio EPA's General Storm Water Permit for Construction Activities for applicable sites; and (2) investigate the implementation of additional related "non-structural" measures, as applicable	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication of required adherence to respective Ohio EPA Permit for applicable sites; and (2) progress/status of implementation of any additional related "non-structural" measures	(1) Copy of ordinance; and (2) supporting documentation, as applicable	1/21/2010
13	Procedures for Storm Water Pollution Prevention Plan (SWP3) review, which incorporate consideration of potential water quality impacts	SWP3 reviews	Since 2007, the City and Stark SWCD have an active Memorandum of Understanding (MOU) which describes the role of Stark SWCD in reviewing applicable sites for compliance with Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 and Stark SWCD's Storm Water Quality Regulations. This includes reviewing plans for storm water quality management of both construction site runoff and post-construction runoff. As such, no applicable site plan is approved without SWP3s being first approved by Stark SWCD. Refer to Chapter 961 "Storm Water Management" ordinance and the "City of Canton Storm Water Management Manual" for further details.	SWP3 review procedures are required per MCM#4. Such procedures also ensure that post-construction controls are designed per requirements for applicable sites.	"Post-Construction Plan Review" (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment)	Yes	Stark SWCD: Urban Resource Coordinator	Yes	(1) Renew MOU between City and Stark SWCD annually; and (2) ensure SWP3s are developed and submitted for applicable sites; and (3) continue to utilize Stark SWCD to review applicable SWP3s	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication of MOU renewal; and (2) indication if SWP3s are developed and submitted for applicable sites; and (3) # of applicable sites in jurisdiction; # of SWP3s reviewed	(1) Copy of MOU and payment verification; and (2),(3) SWP3 review files and supporting documentation, as applicable; and	1/21/2010
14	Procedures for site inspection and enforcement of control measures	Construction site inspections and enforcement	Since 2007, the City and Stark SWCD have an active Memorandum of Understanding (MOU) which describes the role of Stark SWCD in inspecting applicable sites for implementation of appropriate construction site and post-construction storm water quality BMPs as well as sending copies of all inspection reports to the City of Canton and reporting all non-compliant sites for appropriate enforcement actions by the City (via the Planning and Zoning Code and/or other ordinance). Site inspections are required per MCM#4.	Construction site inspections are required per MCM#4. Such inspections also ensure that post-construction controls are installed per requirements for applicable sites.	"BMP Inspection and Maintenance" (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment)	Yes	Stark SWCD: Urban Resource Coordinator	Yes	(1) Renew MOU between City and Stark SWCD annually; and (2) continue to inspect applicable construction sites; and (3) notify City of Canton for enforcement of violations, as applicable	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication of MOU renewal; and (2) # and frequency of site inspections; and (3) # of violation letters issued and corresponding status	(1) Copy of MOU and payment verification; and (2) copies of site inspection letters; and (3) copies of notifications to City, as applicable	1/21/2010

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)		Revised
(Part III.B.6.) Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations		
MCM Permit Requirement(s):		
Part III.B.6.a.	[City of Canton] shall develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations; and	
Part III.B.6.b.	Using training materials that are available from Ohio EPA or other organizations, [City of Canton's] program shall include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance; and	
Part III.B.6.c.	[City of Canton] shall include a list of industrial facilities [it] owns or operates that are subject to Ohio EPA's Industrial Storm Water General Permit or individual NPDES permits for discharges of storm water associated with industrial activity that ultimately discharge to [City of Canton's] MS4. Include the Ohio EPA permit number or a copy of the Industrial NOI form for each facility. For [City of Canton's] municipal facilities that conduct activities described in 40 CFR 122.26(b)(14) that are not required to obtain Industrial Storm Water General Permit coverage, including vehicle maintenance facilities, bus terminals, composting facilities, impoundment lots, and waste transfer stations, a Storm Water Pollution Prevention Plan (SWP3) shall be developed and implemented in accordance with the SWP3 requirements of Ohio EPA's Industrial Storm Water General Permit (OHR000004). [Since City of Canton] initially had coverage under a previous version of this permit [it] shall develop and implement SWP3s for these facilities, if needed, within two years of when [City of Canton's] coverage under this general permit was granted [6/4/09].	----
Response:	The City of Canton owns/operates three "industrial facilities" that are subject to Ohio EPA's Industrial Storm Water General Permit or individual NPDES permits for discharges of storm water associated with industrial activity that ultimately discharge to the City's MS4: 1) Canton Water Pollution Control Center - NPDES Permit No. 3PE00000*OD 2) Canton Water Department (NE) - NPDES Permit No. 3IY00011011 3) Canton Water Department (NW) - NPDES Permit No. 3IY00010*ED The City owns/operates another facility, Canton Water Department (SC) - NPDES Permit No. 3IY00012*ED (in Sugar Creek Township, Stark County), that is subject to the Ohio EPA's individual NPDES permit for discharges of storm water associated with industrial activity but does <i>not</i> ultimately discharge to a City MS4 because the facility is not located within the City of Canton's corporation limits nor is it located within an urbanized area. For development of SWP3s for applicable municipal facilities that conduct activities described in 40 CFR 122.26(b)(14) that are not required to obtain Industrial Storm Water General Permit coverage, see "Service Center SWP3" and "Fire Station #1 SWMP" BMPs below for further details.	1/21/2010
Decision Process (Rationale Statement) for Development of Pollution Prevention/Good Housekeeping - Operations and Maintenance (O&M) Program		
Part III.B.6.d.	[City of Canton] shall document [its] decision process for the development of a pollution prevention/good housekeeping program for municipal operations. [City of Canton's] rationale statement shall address both [its] overall pollution prevention/good housekeeping program and the individual BMPs, measurable goals, and responsible persons for [City of Canton's] program.	----
Response:	The City of Canton supports EPA's assessment that the City must examine and subsequently alter its own actions to help ensure a reduction in the amount and type of pollution that: (1) collects on streets, parking lots, open spaces, and storage and vehicle maintenance areas and is discharged into local waterways; and (2) results from actions such as environmentally damaging land development and flood management practices or poor maintenance of storm sewer systems. While implementing a Pollution Prevention/Good Housekeeping Program is meant primarily to improve or protect receiving water quality by altering municipal or facility operations, it also can result in a cost savings for the City of Canton since proper and timely maintenance of MS4s can help avoid repair costs from damage caused by age and neglect. See USEPA's Stormwater Phase II Final Rule Fact Sheet Series at http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm for further information on the NPDES Phase II Small MS4 Storm Water Program and the associated Minimum Control Measures. The City of Canton is to implement the BMPs described below as part of its Pollution Prevention/Good Housekeeping - Operation and Maintenance Program. The identified BMPs are those that the City believes are needed to meet permit requirements and/or expectations. See "Pollution Prevention/Good Housekeeping for Municipal Operations" on USEPA's National Menu of Stormwater Best Management Practices at http://cfpub.epa.gov/npdes/stormwater/menuofbmps/ for further BMP guidance and information.	1/21/2010
Part III.B.6.d.	The rationale statement shall include the following information, at a minimum:	----
Part III.B.6.d.i.	[City of Canton's] operation and maintenance program to prevent or reduce pollutant runoff from [its] municipal operations. [City of Canton's] program shall specifically list the municipal operations that are impacted by this operation and maintenance program.	
Response:	The City of Canton Service Center (located at 2436 30th St NE, Canton, OH 44705) is made up of the following City departments: Engineering (Civil and Traffic Divisions), Parks, Police Impound, Sanitation, Street, Collection Systems (Sewer), Motor Vehicles (vehicle maintenance), and Recreation. These departments are directly or indirectly involved with certain municipal operations such as roadway maintenance, storm and sanitary sewer maintenance, parks and open space maintenance, fleet maintenance, new infrastructure planning and construction, etc. These activities can ultimately have impacts on the quality of storm water runoff and the receiving local water bodies. Therefore, this MCM impacts the operations performed by the departments that make up the City Service Center more than any other City departments. However, other City Departments may have certain responsibilities pertaining to this MCM as well. City departments/facilities that are affected by or responsible for respective BMPs are provided below.	1/21/2010
Part III.B.6.d.ii.	Any government employee training program [City of Canton] will use to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance. Describe any existing available materials [City of Canton] plans to use. Describe how this training program will be coordinated with the outreach programs developed for the public information minimum measure and the illicit discharge minimum measure.	----
Response:	The City of Canton is required to train government employees on ways to prevent or reduce storm water pollution prevention from municipal activities. See "Government employee training/education" BMP below for further details.	3/8/2010
Part III.B.6.d.iii.	[City of Canton's] program description shall specifically address the following areas:	----
Part III.B.6.d.iii.1.	Maintenance activities, maintenance schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [City of Canton's] MS4.	
Response:	The City of Canton is required to address maintenance activities, maintenance schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to the MS4. See all respective BMPs below for further details.	1/21/2010
Part III.B.6.d.iii.2.	Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, and salt/sand storage locations and snow disposal areas [City of Canton] operates. A description of the materials used for roadway and municipal parking lot winterization (use of salt, sand, bottom ash, etc. or a combination thereof), associated application rates, and the rationale for the selected application rates shall be included. Also identify controls or practices to be used for reducing or eliminating discharges of pollutants resulting from highway and municipal parking lot winterization activities.	----
Response:	The City of Canton is required to implement controls for reducing or eliminating the discharge of pollutants from the identified sources and provide descriptions of winter management materials and a rationale for their associated application rates. See all respective BMPs below for further details.	1/21/2010
Part III.B.6.d.iii.3.	Procedures for the proper disposal of waste removed from [City of Canton's] MS4 and [its] municipal operations, including dredge spoil, accumulated sediments, floatables, and other debris.	----
Response:	The City of Canton is required to implement procedures for the proper disposal of waste removed from the MS4 and municipal operations. See all respective BMPs below for further details.	1/21/2010
Part III.B.6.d.iii.4.	Procedures to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of additional water quality protection devices or practices.	----
Response:	The City of Canton is required to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of water quality protection devices. See "Water quality considerations for flood management projects" BMP below for further details.	1/21/2010
Part III.B.6.d.iv.	Who is responsible for overall management and implementation of [City of Canton's] pollution prevention/good housekeeping program and, if different, who is responsible for each of the BMPs identified for this program.	----
Response:	The City of Canton interprets the term "pollution prevention/good housekeeping program" to be synonymous with the term "operation and maintenance program" as used elsewhere in the permit for describing the requirements of this MCM. Even though the Assistant City Engineer in the Civil Division of the Engineering Department is the primary contact for the SWMP and responsible for preparing annual reports, the Service Director is responsible for the <i>overall</i> management and implementation of the City of Canton's Pollution Prevention/Good Housekeeping Program. However, each BMP listed below identifies the particular City department or entity and position primarily responsible for the implementation of the respective BMP. Each responsible position is to maintain all records of supporting information for respective BMP implementation.	1/21/2010
Part III.B.6.d.v.	How [City of Canton] will evaluate the success of this minimum measure, including how [City of Canton] selected the measurable goals for each of the BMPs.	----
Response:	In time, the City of Canton is to measure the success of this MCM by determining if the measurable goals for the BMPs are met (through annual reports) as well as by implementing the BMPs in accordance with applicable recommendations as identified on USEPA's National Menu of Stormwater Best Management Practices. Each identified responsible position is to provide the respective information for Annual Reports to Chris Barnes of the City Engineering Department by February 15th, annually. Ideally, the success of the City's SWMP may be evaluated based on the results of field monitoring in the Nimishillen Creek and/or other indicators. Each BMP listed below describes an associated measurable goal or goals. The goals were selected based on some practical and/or quantifiable (if possible) aspect of their implementation and the ease of measuring such aspect which provides simple indication of whether the BMP is successfully	1/21/2010
Performance Standards		
Part III.B.6.e.	[City of Canton's] pollution prevention/good housekeeping program shall include, at a minimum, annual employee training. [City of Canton's] operation and maintenance program shall include appropriate procedures, controls, maintenance schedules, and recordkeeping to address Part III.B.6.d.iii of this permit.	----
Annual Reporting		
Part III.B.6.f.	Annual Reports shall document the following: (1) summary of employee training program(s) implemented with number of employees that attended and (2) summary of activities and procedures implemented for O&M Program.	----

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)															Revised	
(Part III.B.6.) Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations																
"Operation and Maintenance Program" (a.k.a. "Pollution Prevention/Good Housekeeping Program"): Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements																
[1] BMP #	Part III.A.1.a. [2] Permit Requirement	Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.e. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.b. [7] Legal Authority to Implement?	[8] City Depts/Facilities (Division) with significant involvement	Part III.A.1.d. [9] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [10] Agreement Needed?	Part III.A.1.c. [11] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [12] Rationale for Measurable Goal(s) Selection	Part III.B.6.f. [13] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [14] Information for Responsible Position(s) to Maintain for Audits			
1	Government employee training to prevent and reduce storm water pollution...	Government employee training/education	Such training is required per Part III.B.6.a. and b. and Part III.B.6.e. This requirement is addressed under MCM #1. See "Government employee training/education" BMP under MCM #1 for details.												3/8/2010	
2	Storm Water Pollution Prevention Plans (SWP3s) for municipal facilities that conduct activities described in 40 CFR 122.26(f)(14) that are not required to obtain Industrial Storm Water General Permit coverage, including (continued on next page):	Vehicle maintenance facilities	Division of Motor Vehicles SWP3	The City's Division of Motor Vehicles (DMV) is the City vehicle maintenance facility located at the City Service Center: 2436 30th St NE, Canton, OH 44705). This facility falls within the designated categories of "industrial facilities" that the City owns or operates. However, per Ohio EPA's June 2009 "Guidance for MS4 Operated Industrial Facilities" flowchart and answering "No" to all eleven questions of the "Exposure Checklist" based on the descriptions of "industrial materials and activities" on USEPA's "No Exposure Certification", this facility can certify "No Exposure". Therefore, an SWP3 is not required to be prepared and implemented in accordance with the SWP3 requirements of Ohio EPA's Industrial Storm Water General Permit (OHR000004).	Required per Part III.B.6.c.	(See Ohio EPA's June 2009 "Guidance for MS4 Operated Industrial Facilities" flowchart, USEPA's "No Exposure Certification for Exclusion from NPDES Stormwater Permitting", and Industrial Storm Water General Permit (OHR000004))	Yes	Division of Motor Vehicles (DMV)	DMV: Superintendent	No	Annually ensure USEPA's "No Exposure Certification" applies	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Indication if "No Exposure" can be certified	Completed "No Exposure Certification"	3/29/2010	
3			Fire Station #1 SWP3	City Fire Station #1 is located at 110 7th St SW, Canton, OH 44702. Fire Station #1 falls within the designated categories of "municipal facilities" that the City owns or operates because it has a vehicle maintenance facility where Fire Department owned/operated vehicles are serviced/maintained. However, per Ohio EPA's June 2009 "Guidance for MS4 Operated Industrial Facilities" flowchart and answering "No" to all eleven questions of the "Exposure Checklist" based on the descriptions of "industrial materials and activities" on USEPA's "No Exposure Certification", this facility can certify "No Exposure". Therefore, an SWP3 is not required to be prepared and implemented in accordance with the SWP3 requirements of Ohio EPA's Industrial Storm Water General Permit (OHR000004).	Required per Part III.B.6.c.	(See Ohio EPA's June 2009 "Guidance for MS4 Operated Industrial Facilities" flowchart, USEPA's "No Exposure Certification for Exclusion from NPDES Stormwater Permitting", and Industrial Storm Water General Permit (OHR000004))	Yes	Fire Station #1	Fire: Fire Chief	No	Annually ensure USEPA's "No Exposure Certification" applies	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Indication if "No Exposure" can be certified	Completed "No Exposure Certification"	3/29/2010	
----		Bus terminals	SWP3s for bus terminals are required per Part III.B.6.c. However, the City of Canton does not own or operate any bus terminals and therefore is not required to develop and implement an SWP3 for such.													1/21/2010
----		Composting facilities	SWP3s for composting facilities are required per Part III.B.6.c. However, the City of Canton does not own or operate any composting facilities and therefore is not required to develop and implement an SWP3 for such.													1/21/2010

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)

(Part III.B.6.) Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

"Operation and Maintenance Program" (a.k.a. "Pollution Prevention/Good Housekeeping Program"): Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

Operation and Maintenance Program (Annual)																
[1] BMP #	Part III.A.1.a. [2] Permit Requirement		Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.e. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.b. [7] Legal Authority to Implement?	[8] City Depts/Facilities (Division) with <u>significant</u> involvement	Part III.A.1.d. [9] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [10] Agreement Needed?	Part III.A.1.c. [11] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [12] Rationale for Measurable Goal(s) Selection	Part III.B.6.f. [13] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [14] Information for Responsible Position(s) to Maintain for Audits		
4	Storm Water Pollution Prevention Plans (SWP3s) for municipal facilities... (continued from previous page)		Impoundment lots	Impound Lot SWP3	The City's Police Department Impound Lot falls within the designated categories of "municipal facilities" (impound lots) that the City owns or operates. The Impound Lot is where impounded vehicles are taken and stored until the vehicle owners pay to retrieve the vehicles or the vehicles are sold via auction. The Impound Lot is located at the City Service Center: 2436 30th St NE, Canton, OH 44705). However, per footnote #2 on Ohio EPA's June 2009 "Guidance for MS4 Operated Industrial Facilities" flowchart, the City Impound Lot does not have a vehicle maintenance shop, does not perform equipment cleaning operations, and does not perform airport deicing operations. Therefore, an SWP3 is not required to be prepared and implemented in accordance with the SWP3 requirements of Ohio EPA's Industrial Storm Water General Permit (OHR000004).	Required per Part III.B.6.c.	(See Ohio EPA's June 2009 "Guidance for MS4 Operated Industrial Facilities" flowchart and Industrial Storm Water General Permit (OHR000004))	Yes	Police (Impound)	Police: Lieutenant	No	Annually verify status of Impound Lot with current Ohio EPA Industrial Facility SWP3 applicability	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Indication if SWP3 must be developed and implemented	Supporting documentation, as applicable	3/15/2010
----			Waste transfer stations	SWP3s for waste transfer stations are required per Part III.B.6.c. However, the City of Canton does not own or operate any waste transfer stations and therefore is not required to develop and implement an SWP3 for such.												
5	Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] MS4 (continued on next page)		Maintenance activities (continued on next page)	Street sweeping	Streets, roads, highways and parking lots accumulate significant amounts of pollutants that contribute to stormwater pollutant runoff to surface waters. Pollutants, including sediment, debris, trash, road salt, and trace metals can be minimized by street sweeping. Street sweeping can also improve the aesthetics of municipal roadways, control dust and decrease the accumulation of pollutants in catch basins. An effective municipal street sweeping program can meet regulatory requirements, assess street sweeping effectiveness, and minimize pollutants in roadways. Street sweeping is a maintenance activity the City performs to reduce floatables and other pollutants to and from the MS4. The Street Department performs routine sweeping of city streets throughout the year. Maintenance and inspection schedules have been developed for certain City streets.	BMP assists in satisfying Parts III.B.6.d.iii.1. and 2.	"Parking Lot and Street Cleaning" (under USEPA MCM#6: Pollution Prevention/ Good Housekeeping for Municipal Operations)	Yes	Street	Street: Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and (2) continue to perform street sweeping to reduce floatables and other pollutants to and from the MS4; and (3) sweep City streets in accordance with maintenance schedules, as applicable	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and (2) total # of lane-miles swept; and (3) indication if streets are swept in accordance with maintenance schedules, as applicable	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and (2) sweeping records documenting lane-miles swept; and (3) copy of maintenance schedules indicating sweeping schedules, as applicable	1/21/2010

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)															Revised
(Part III.B.6.) Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations															
"Operation and Maintenance Program" (a.k.a. "Pollution Prevention/Good Housekeeping Program"): Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements															
[1] BMP #	Part III.A.1.a. [2] Permit Requirement	Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.e. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.b. [7] Legal Authority to Implement?	[8] City Depts./Facilities (Division) with <u>significant</u> involvement	Part III.A.1.d. [9] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [10] Agreement Needed?	Part III.A.1.c. [11] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [12] Rationale for Measurable Goal(s) Selection	Part III.B.6.f. [13] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [14] Information for Responsible Position(s) to Maintain for Audits		
6	Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] MS4 (continued from previous page and on next page)	Maintenance activities (continued from previous page)	Lots used for public parking	Municipal parking lots accumulate significant amounts of pollutants that contribute to stormwater pollutant runoff to surface waters. Pollutants, including sediment, debris, trash, road salt, and trace metals can be minimized by lot sweeping. Lot sweeping can also improve the aesthetics of municipal lots, control dust and decrease the accumulation of pollutants in catch basins. Lot sweeping is a maintenance activity the City performs, as necessary, to reduce floatables and other pollutants to and from the MS4.	BMP assists in satisfying Parts III.B.6.d.iii.1. and 2.	Yes	Engineering (Traffic: Parking)	Engineering (Traffic): Assistant City Engineer	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and (2) sweep all public-use parking lots/decks a minimum of 4 times per year	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and (2) locations/names of public-use lots/decks and # of times swept per year	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and (2) respective sweeping records documenting lots/decks swept	3/15/2010	
			Lots used for City employee parking	Municipal (City-owned) parking lots can be classified into 2 categories: those used for public parking (2 decks, 3 lots) and those used for City employee parking (various locations throughout City). All public-use parking lots are maintained by the Traffic: Parking Division of the City Engineering Department, while the maintenance of all City employee parking lots is typically the responsibility of the respective departments utilizing the lots. Scheduled sweepings are typically performed on public-use lots, while visual inspections are used to determine the need for lot sweeping on City employee lots. The Engineering Traffic: Parking Division and Street Department both have street sweepers that are used as necessary, for public-use and City employee lots, respectively, or lot sweeping may be contracted out if desired.			Street	Street: Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and (2) perform lot sweeping as requested by respective departments utilizing lots		(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and (2) locations of City employee lots swept and # of times swept per year	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and (2) respective sweeping records documenting lots/decks swept	1/21/2010	
7			Storm drain system cleaning	Storm drain system cleaning is a maintenance activity the City performs to reduce floatables and other pollutants to and from the MS4. The Collection Systems (Sewer) Department performs catch basin, manhole, and storm line cleaning throughout the year. Priority is typically given to certain storm sewer systems (such as those serving main streets and highways) while others are cleaned based on responses to complaints.	BMP assists in satisfying Parts III.B.6.d.iii.1. and 2.	Yes	Collection Systems (Sewer)	Collection Systems (Sewer): Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and (2) continue to perform storm sewer system cleaning to reduce floatables and other pollutants to and from the MS4	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and (2) # of manholes and catch basins cleaned; and footage of storm lines cleaned	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and (2) storm sewer system cleaning records	3/8/2010	
----	Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] MS4 (continued from previous page and on next page)	Schedules	Some of the BMPs implemented by the City of Canton to reduce floatables and other pollutants to [and from] the MS4 are scheduled, as applicable. Others are "reactive" and are performed in response to complaints or necessity. Many of the BMPs are typically "routine maintenance" by nature and are performed continually or on an as-needed basis. For example, "street sweeping" and "lot sweeping" are often "scheduled" as part of routine maintenance instead of performed as a reaction to complaints. "Long term inspection of permanent post-construction storm water quality BMPs" has a "scheduled" aspect to it in that the Stark SWCD annually performs inspections of permanent post-construction storm water quality BMPs. So, depending on the nature of the respective BMP, there may or may not be a "scheduled" aspect to it. See each BMP within this MCM for further details and indication of any "scheduled" aspect.											1/21/2010	

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)															Revised
(Part III.B.6.) Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations															
"Operation and Maintenance Program" (a.k.a. "Pollution Prevention/Good Housekeeping Program"): Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements															
[1] BMP #	Part III.A.1.a. [2] Permit Requirement	Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.e. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.b. [7] Legal Authority to Implement?	[8] City Depts/Facilities (Division) with <u>significant</u> involvement	Part III.A.1.d. [9] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [10] Agreement Needed?	Part III.A.1.c. [11] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [12] Rationale for Measurable Goal(s) Selection	Part III.B.6.f. [13] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [14] Information for Responsible Position(s) to Maintain for Audits		
8	Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] MS4 (continued from previous page)	Inspection procedures	Dry-weather field-screening of storm water outfalls	Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] MS4 are required per Part III.B.6.d.iii.1. This BMP is an inspection procedure that assists in satisfying the permit requirement and is also performed to help satisfy requirements of MCM #3. See "Dry-weather field-screening of storm water outfalls" BMP under MCM #3 for details.											3/15/2010
9			Sewer televising	Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] MS4 are required per Part III.B.6.d.iii.1. This BMP is an inspection procedure that assists in satisfying the permit requirement and is also performed to help satisfy requirements of MCM #3. See "Sewer televising" BMP under MCM #3 for details.											1/21/2010
10			Sewer dye-testing	Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] MS4 are required per Part III.B.6.d.iii.1. This BMP is an inspection procedure that assists in satisfying the permit requirement and is also performed to help satisfy requirements of MCM #3. See "Sewer dye-testing" BMP under MCM #3 for details.											1/21/2010
11			Long-term maintenance of post-construction BMPs	Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] MS4 are required per Part III.B.6.d.iii.1. This BMP includes an inspection procedure that assists in satisfying the permit requirement and is also performed to help satisfy requirements of MCM #5. See "Long-term maintenance of post-construction BMPs" BMP under MCM #5 for details.											3/29/2010
12	Controls for reducing or eliminating the discharge of pollutants from (continued on next page):	Streets, roads, highways	Street sweeping	Controls for reducing or eliminating the discharge of pollutants from streets, roads, and highways are required per Part III.B.6.d.iii.2. The identified BMPs are BMPs implemented by the City to assist in satisfying this permit requirement as well as others. See the respective BMP descriptions under MCM #6 for details.											1/21/2010
13			Storm drain system cleaning												
14			Proper winter materials management												
15		Municipal parking lots (including parking garages)	Lot sweeping	Controls for reducing or eliminating the discharge of pollutants from municipal parking lots (including parking garages) are required per Part III.B.6.d.iii.2. The identified BMPs are BMPs implemented by the City to assist in satisfying this permit requirement as well as others. See the respective BMP descriptions under MCM #6 for details.											1/21/2010
16			Storm drain system cleaning												
17			Proper winter materials management												

CITY OF CANTON, OHIO: NPDES PHASE II STORMWATER MANAGEMENT PROGRAM (SWMP)															Revised	
(Part III.B.6.) Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations																
"Operation and Maintenance Program" (a.k.a. "Pollution Prevention/Good Housekeeping Program"): Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements																
[1] BMP #	Part III.A.1.a. [2] Permit Requirement		Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.e. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.b. [7] Legal Authority to Implement?	[8] City Depts/Facilities (Division) with <u>significant</u> involvement	Part III.A.1.d. [9] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [10] Agreement Needed?	Part III.A.1.c. [11] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [12] Rationale for Measurable Goal(s) Selection	Part III.B.6.f. [13] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [14] Information for Responsible Position(s) to Maintain for Audits		
19	Controls for reducing or eliminating the discharge of pollutants from (continued from previous page and on next page):		[Municipal properties and/or facilities &] maintenance and storage yards (continued from previous page and on next page)	Proper municipal vehicle fueling	Fueling fleets of municipal vehicles can generate spills and leaks of fuel (gasoline and diesel fuel) and heavy metals - disproportionately toxic compounds that if washed into the storm drain system by stormwater runoff can seriously impair the water quality of nearby waterbodies. Various BMPs can be implemented at fueling stations to reduce or prohibit fuels from washing into adjacent storm drainage systems. The City of Canton operates 4 municipal vehicle fueling stations. To discourage illicit discharges from the Service Center fueling station, the City provides the following BMPs: covered fuel area (prohibits direct rainfall contact) and catch basins with water quality inserts (see "Catch basins with water quality inserts" BMP for details). Spill cleanup materials are to be available at all four vehicle fueling stations. In cases of fuel spills on the ground surface, trained employees are to attempt to utilize absorbant materials accordingly to ensure no fuels wash into storm drainage systems.	BMP assists in satisfying Part III.B.6.d.iii.2.	Yes	"Municipal Vehicle Fueling" (under USEPA MCM#6: Pollution Prevention/ Good Housekeeping for Municipal Operations)	DMV (for Service Center)	DMV: Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and (2) identify current fueling station practices/ features that are in conformance with USEPA recommendations; and (3) identify any deficiencies in current practices/ features and investigate corresponding BMPs/ features to implement at respective fueling stations to be in better conformance with USEPA recommendations; and (4) ensure spill prevention plans and cleanup materials are readily available at each fueling station; and (5) ensure appropriate employees are trained to properly respond to fuel spills	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and (2) summary of current facility practices/ features that are in conformance with USEPA recommendations; and (3) summary of any deficiencies in current practices/ features and corresponding status of investigation of additional BMPs/ features to implement to be in better conformance with USEPA recommendations, as applicable; and (4) indication if spill prevention plans and cleanup materials are provided at fueling station; and (5) # of employees properly trained to respond to fuel spills	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and (2) description of respective fueling station; and list of current practices/ features at station and description of their conformance with USEPA recommendations; and (3) supporting documentation of status of additional BMP/ features investigation and implementation, as applicable; and (4) summary of implementation status of spill prevention plans and cleanup materials; and copy of spill prevention plan; and (5) description of respective training, dates, and employee names	3/15/2010
									DMV (for Sign & Paint Shop)	DMV: Superintendent	No				1/21/2010	
									WRF	WRF: Superintendent	No					
									Water (for Sugarcreek WTP)	Water: Superintendent	No					

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)															Revised
(Part III.B.6.) Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations															
"Operation and Maintenance Program" (a.k.a. "Pollution Prevention/Good Housekeeping Program"): Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements															
[1] BMP #	Part III.A.1.a. [2] Permit Requirement	Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.e. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.b. [7] Legal Authority to Implement?	[8] City Depts/Facilities (Division) with <u>significant</u> involvement	Part III.A.1.d. [9] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [10] Agreement Needed?	Part III.A.1.c. [11] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [12] Rationale for Measurable Goal(s) Selection	Part III.B.6.f. [13] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [14] Information for Responsible Position(s) to Maintain for Audits		
20	Controls for reducing or eliminating the discharge of pollutants from (continued from previous page and on next page):	[Municipal properties and/or facilities &] maintenance and storage yards (continued from previous page and on next page)	Proper municipal vehicle and equipment maintenance	Common activities at municipal maintenance shops include parts cleaning, vehicle fluid replacement, and equipment replacement and repair. Automotive maintenance facilities are considered to be stormwater "hot spots." Hotspots are areas that generate significant loads of hydrocarbons, trace metals, and other pollutants that can affect the quality of stormwater. Some of the wastes generated at automobile maintenance facilities include: solvents (degreasers, paint thinners, etc.); and antifreeze; and brake fluid and brake pad dust; and battery acid; and motor oil; and fuel (gasoline, diesel, kerosene); and lubricating grease; and etc. Fluid spills and improper disposal of materials result in pollutants, heavy metals, and toxic materials entering ground and surface water supplies, which can create public health and environmental risks.	BMP assists in satisfying Part III.B.6.d.iii.2.	Yes	DMV	DMV: Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and (2) identify current vehicle and equipment maintenance practices that are in conformance with USEPA recommendations; and (3) identify any deficiencies in current practices and investigate corresponding BMPs to implement at respective maintenance garages to be in better conformance with USEPA recommendations; and	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and (2) summary of current practices in conformance with USEPA recommendations; and (3) summary of any deficiencies in current practices and corresponding status of investigation of additional BMPs to implement to be in better conformance with USEPA recommendations, as applicable; and	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and (2) list of current practices and description of their conformance with USEPA recommendations; and (3) supporting documentation of status of additional BMP investigation and implementation, as applicable; and	3/15/2010	
			Fire (Fire Station #1)				Fire: Fire Chief	No	(4) ensure spill prevention plans and cleanup materials are readily available at each maintenance garage; and (5) ensure appropriate employees are trained to properly respond to spills	(4) indication if spill prevention plans and cleanup materials are provided at maintenance facilities; and (5) # of employees properly trained to respond to spills		(4) summary of implementation status of spill prevention plans and cleanup materials; and copy of spill prevention plan; and (5) description of respective training, dates, and employee names	1/21/2010		

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)															Revised 3/15/2010
(Part III.B.6.) Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations															
"Operation and Maintenance Program" (a.k.a. "Pollution Prevention/Good Housekeeping Program"): Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements															
[1] BMP #	Part III.A.1.a. [2] Permit Requirement	Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.e. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.b. [7] Legal Authority to Implement?	[8] City Depts/Facilities (Division) with <u>significant</u> involvement	Part III.A.1.d. [9] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [10] Agreement Needed?	Part III.A.1.c. [11] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [12] Rationale for Measurable Goal(s) Selection	Part III.B.6.f. [13] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [14] Information for Responsible Position(s) to Maintain for Audits		
21	Controls for reducing or eliminating the discharge of pollutants from (continued from previous page and on next page):	[Municipal properties and/or facilities &] maintenance and storage yards (continued from previous page and on next page)	Proper municipal vehicle and equipment washing	Municipal vehicle washing can generate dry weather runoff contaminated with detergents, oils, grease, and heavy metals. Vehicle washing BMPs can eliminate contaminated wash water discharges to the storm sewer system. Such BMPs include installing wash racks that discharge wash water to the sanitary sewer, and contracting the services of commercial car washes, which are permitted to discharge wash water to the sanitary sewer system.	BMP assists in satisfying Part III.B.6.d.iii.2.	"Municipal Vehicle and Equipment Washing" (under USEPA MCM#6: Pollution Prevention/ Good Housekeeping for Municipal Operations)	Yes	DMV: indoor washing at DMV	DMV: Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and		
Street: indoor washing at Street Dept			Street: Superintendent	No											
Parks: indoor washing at Parks Dept			Parks: Director	No											
(Sewer): indoor washing at Sewer Dept			Collection Systems (Sewer): Superintendent	No				(2) identify current municipal vehicle and equipment washing practices/ features that are in conformance with USEPA recommendations; and	(2) summary of current practices/ features in conformance with USEPA recommendations; and	(2) list of current practices/ features and description of their conformance with USEPA recommendations; and					
Street: outdoor washing at Service Center			Street: Superintendent	No											
Water Reclamation Facility (WRF): indoor washing at WRF			WRF: Superintendent	No											
Water: indoor washing at Water Dept			Water: Superintendent	No				(3) identify any deficiencies in current practices/ features and investigate corresponding BMPs/ features to implement at respective washing facilities to be in better conformance with USEPA recommendations	(3) summary of any deficiencies in current practices/ features and corresponding status of investigation of additional BMPs/ features to implement to be in better conformance with USEPA recommendations, as applicable	(3) supporting documentation of status of additional BMP/ feature investigation and implementation, as applicable					
Fire: washing at fire stations			Fire: Fire Chief	No											
All Fire Department vehicles are washed indoor at each station. The cleaning solution uses biodegradable surfactants, containing no soap or caustic agents.			(Various): washing at private car washes	Mayor: Service Director				Yes	Continue to annually contract with local car washes for washing of City vehicles	Stated goal is easily measurable and/or demands indication if BMP	Indication if annual contract with commercial car washes is in place	Copy of contract			
The City annually contracts with local commercial car washes for washing of other City vehicles used by various departments, as necessary. All commercial car washes are required to have wash water treated via sanitary sewer.															

CITY OF CANTON, OHIO: NPDES PHASE II STORMWATER MANAGEMENT PROGRAM (SWMP)															Revised
(Part III.B.6.) Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations															
"Operation and Maintenance Program" (a.k.a. "Pollution Prevention/Good Housekeeping Program"): Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements															
[1] BMP #	Part III.A.1.a.		Part III.A.1.a.	Part III.A.1.a.	Part III.A.1.e.	[6]	Part III.A.1.b.	[8]	Part III.A.1.d.	Part III.C.	Part III.A.1.c.	Part III.A.1.e.	Part III.B.6.f.	Part IV.B. & C.	
	[2] Permit Requirement	[3] BMP Name	[4] BMP Description	[5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	[7] Legal Authority to Implement?	[8] City Depts/Facilities (Division) with <u>significant</u> involvement	[9] Responsible Entity/ City Dept(s): Position(s)	[10] Agreement Needed?	[11] Measurable Goal(s) for Each Responsible Position	[12] Rationale for Measurable Goal(s) Selection	[13] Information for Responsible Position(s) to Document for Annual Reports	[14] Information for Responsible Position(s) to Maintain for Audits		
22	Controls for reducing or eliminating the discharge of pollutants from (continued from previous page and on next page): [Municipal properties and/or facilities &] maintenance and storage yards (continued from previous page)		Proper materials management Responsible management of common chemicals, such as fertilizers, solvents, paints, cleaners, automotive products, and hazardous materials can significantly reduce polluted runoff. Such products must be handled properly in all stages of development, use, and disposal. Proper materials management entails the selection of the individual product, the correct use and storage of the product, the responsible disposal of associated waste(s), and the proper responses to spills. Proper materials management reduces the likelihood of accidental spills or releases of hazardous materials during storm or flooding events. In addition, health and safety conditions at the facility will improve. Simple practices for proper materials management include improving maintenance of machinery; and using drip pans for leaky containers or equipment until repairs can be made; and establishing material storage and inventory controls (especially for hazardous materials); and improving routine cleaning and inspection of facilities where materials are stored or processed; and storing materials indoors or under roof; and ensuring fueling areas are under roof; and providing tarps for materials that must be kept outside; and ensuring dumpsters have lids; and maintaining organized workplaces; and securing lids on containers; and stacking containers in accordance with the manufacturers' directions to avoid damaging the container or the product itself; and storing containers on pallets or equivalent structures (this facilitates inspection for leaks and prevents the containers from coming into contact with wet floors; and which can cause corrosion (this consideration also reduces the incidence of damage by pests); and delegating the responsibility for management of hazardous materials to personnel trained and experienced in hazardous substance management; and etc., and educating employees about the benefits of such practices.	BMP assists in satisfying Part III.B.6.d.iii.2.	"Materials Management", "Hazardous Materials Storage", "Municipal Facilities Management", and "Spill Response and Prevention" (under USEPA MCM#6: Pollution Prevention/ Good Housekeeping for Municipal Operations)	Yes	Collection Systems (Sewer)	Collection Systems (Sewer): Superintendent	No	(1) Annually review applicable referenced USEPA BMP descriptions with appropriate department/ facility employees; and (2) identify current materials management practices that are in conformance with USEPA recommendations, as applicable; and (3) identify any deficiencies in current practices and investigate corresponding BMPs to implement to be in better conformance with USEPA recommendations; and (4) ensure spill prevention plans and cleanup materials are readily available at each department/ facility; and (5) ensure appropriate employees are trained to properly respond to spills	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and (2) summary of current practices that are in conformance with USEPA recommendations; and (3) summary of any deficiencies in current practices and corresponding status of investigation of additional BMPs to implement to be in better conformance with USEPA recommendations, as applicable; and (4) indication if spill prevention plans and cleanup materials are provided at respective department/ facility; and (5) # of employees properly trained to respond to spills	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and (2) list of current practices and description of their conformance with USEPA recommendations; and (3) supporting documentation of status of additional BMP investigation and implementation, as applicable; and (4) summary of implementation status of spill prevention plans and cleanup materials; and copy of spill prevention plan; and (5) description of respective training, dates, and employee names	3/15/2010	
Engineering (Traffic: Signal, Sign & Paint; Parking)							Engineering (Traffic): Assistant City Engineer	No							
Fire stations							Fire: Fire Chief	No							
Parks							Parks: Director	No							
Police (Impound Lot)							Police: Lieutenant	No							
Recreation							Recreation: Director	No							
Sanitation							Sanitation: Superintendent	No							
Water Reclamation Facility (WRF)							WRF: Superintendent	No							
Division of Motor Vehicles (DMV)							DMV: Superintendent	No							
Street							Street: Superintendent	No							
Water							Water: Superintendent	No							
Building Maintenance							Building Maint.: Superintendent	No							
Civic Center							Civic Center: Manager	No							
23	Catch basins with water quality inserts		In 2007, two Nyloplast Catch Basin Insert Storm Pure Infiltration Systems were installed at two critical storm sewer catch basin locations (downstream from the vehicle fuel pumps and the outdoor vehicle washout area) in the Service Center parking lot. These systems consist of features that capture sediment, debris, and tiny particles of hydrocarbons and oil-bound pollutants and therefore prevent or reduce such pollutants from discharging into the MS4 and ultimately into surface waters. The systems are inspected monthly and cleaned by the Street Department accordingly.	BMP assists in satisfying Part III.B.6.d.iii.2.	"Manufactured Products for Stormwater Inlets" (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment)	Yes	Street	Street: Superintendent	No	(1) Continue to utilize catch basins with water quality inserts at critical locations; and (2) inspect such catch basins monthly and clean/ maintain as needed	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if such catch basins are continually utilized at critical locations; and (2) frequency of inspections and summary of associated maintenance	Supporting documentation, as applicable	1/21/2010	

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)

(Part III.B.6.) Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

"Operation and Maintenance Program" (a.k.a. "Pollution Prevention/Good Housekeeping Program"): Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

[1] BMP #	Part III.A.1.a. [2] Permit Requirement		Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.e. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.b. [7] Legal Authority to Implement?	[8] City Depts/Facilities (Division) with significant involvement	Part III.A.1.d. [9] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [10] Agreement Needed?	Part III.A.1.c. [11] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [12] Rationale for Measurable Goal(s) Selection	Part III.B.6.f. [13] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [14] Information for Responsible Position(s) to Maintain for Audits	
----	Controls for reducing or eliminating the discharge of pollutants from (continued from previous page and on next page):	Waste transfer stations	Controls for reducing or eliminating the discharge of pollutants from waste transfer stations are required per Part III.B.6.d.iii.2. However, the City of Canton does not own or operate any waste transfer stations and therefore has no controls for reducing or eliminating the discharge of pollutants from such.												3/15/2010
24		Fleet or maintenance shops with outdoor storage areas	Indoor storage areas for fleet maintenance garages	Due to the exposure to weather, fleet or maintenance shops with outdoor materials storage areas have a much higher likelihood of contributing to pollutant runoff than those with indoor storage areas only. The City of Canton owns/operates two fleet maintenance shops (garages). These garages are located at the Division of Motor Vehicles (at City Service Center: 2436 30th St NE, Canton, OH 44705) and at Fire Station #1 (at 110 7th St SW, Canton, OH 44702). However, neither of these maintenance garages store any materials outdoors. All fleet maintenance materials are stored indoor.	BMP assists in satisfying Part III.B.6.d.iii.2.	"Municipal Vehicle and Equipment Maintenance", "Materials Management", and "Hazardous Materials Storage" (under USEPA MCM#6: Pollution Prevention/ Good Housekeeping for Municipal Operations)	Yes	DMV	DMV: Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and (2) continue to store all respective fleet maintenance materials and equipment indoors	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and (2) indication if all respective fleet maintenance materials and equipment are continually stored indoors	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and (2) supporting documentation, as applicable	1/21/2010
25		Salt/sand storage locations	Proper storage of road salt	Many of the problems associated with contamination of local waterways stem from the improper storage of deicing materials. Salts are very soluble when they come into contact with stormwater. They can migrate into ground water used for public water supplies and also contaminate surface waters. The City of Canton has 6 salt domes of which 1 is inactive and another is utilized by ODOT. All salt utilized by the City is stored under roof in the salt domes.	Required per Part III.B.6.d.iii.2.	"Road Salt Application and Storage" and "Roadway and Bridge Maintenance" (under USEPA MCM#6: Pollution Prevention/ Good Housekeeping for Municipal Operations)	Yes	Street	Street: Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and (2) continue to store all de-icing salt in salt domes	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and (2) indication that all de-icing salt is stored in salt domes	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and (2) supporting documentation, as applicable	1/21/2010
26		Snow disposal areas	Proper disposal of snow	The City of Canton Street Department plows snow from City streets. Snow is typically plowed to the side of the streets. Upon heavier snowfalls, parking bans can be issued to make more room for plowed snow. In extremely rare circumstances, excess snow from downtown streets is transported to and disposed of at a City maintenance outpost where, after snow melt, remaining debris are swept up as needed.	Required per Part III.B.6.d.iii.2.	"Road Salt Application and Storage", "Roadway and Bridge Maintenance", and "Parking Lot and Street Cleaning" (under USEPA MCM#6: Pollution Prevention/ Good Housekeeping for Municipal Operations)	Yes	Street	Street: Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and (2) continue to dispose of snow as described	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and (2) summary description of snow disposal practices; and indication if any snow was disposed at outposts and the corresponding practices used to control pollutant runoff, as applicable	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and (2) supporting documentation, as applicable	1/21/2010

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)															Revised			
(Part III.B.6.) Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations																		
"Operation and Maintenance Program" (a.k.a. "Pollution Prevention/Good Housekeeping Program"): Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements																		
[1] BMP #	Part III.A.1.a. [2] Permit Requirement		Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.e. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.b. [7] Legal Authority to Implement?	[8] City Depts/Facilities (Division) with <u>significant</u> involvement	Part III.A.1.d. [9] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [10] Agreement Needed?	Part III.A.1.c. [11] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [12] Rationale for Measurable Goal(s) Selection	Part III.B.6.f. [13] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [14] Information for Responsible Position(s) to Maintain for Audits				
28	Descriptions of materials used for roadway and municipal parking lot winterization (use of salt, sand, bottom ash, etc or a combination thereof), associated application rates, and the rationale for the selected application rates		Municipal Parking lots	Proper winter materials management:	Lots used for public parking			"Road Salt Application and Storage" and "Roadway and Bridge Maintenance" (under USEPA MCM#6: Pollution Prevention/ Good Housekeeping for Municipal Operations)	Yes		Engineering (Traffic: Parking)	Engineering (Traffic): Assistant City Engineer	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and	
Parks											Parks: Director	No	(2) identify current de-icing/ anti-icing materials and application practices that are in conformance with USEPA recommendations; and	(2) summary of current de-icing/ anti-icing materials and practices that are in conformance with USEPA recommendations; and		(2) list of current de-icing/ anti-icing materials and practices and description of their conformance with USEPA recommendations; and		
Street											Street: Superintendent	No	(3) identify any deficiencies in current de-icing/ anti-icing materials and/or practices and investigate corresponding materials BMPs to implement to be in better conformance with USEPA recommendations; and	(3) summary of any deficiencies in current de-icing/ anti-icing materials and/or practices and corresponding status of investigation of additional materials and/or BMPs to implement to be in better conformance with USEPA recommendations, as applicable; and		(3) supporting documentation of status of additional BMP investigation and implementation, as applicable; and		
Water											Water: Superintendent	No	(4) track the annual usage of de-icing/ anti-icing management materials and application rates	(4) summary of annual usage of de-icing/ anti-icing materials, application rates, and rationale for rates		(4) supporting documentation, as applicable		
Water Reclamation Facility (WRF)											WRF: Superintendent	No						
29	Controls or practices to be used for reducing or eliminating discharges of pollutants resulting from roadway and municipal parking lot winterization activities			Street sweeping														
30																		Lot sweeping
31																		Proper storage of road salt
32																		Proper disposal of snow
33																		Proper winter materials management
Controls or practices to be used for reducing or eliminating discharges of pollutants resulting from roadway and municipal parking lot winterization activities are required per permit Part III.B.6.d.iii.2. The identified BMPs are BMPs implemented by the City to assist in satisfying this permit requirement as well as others. See the respective BMP descriptions under MCM #6 for details.															3/15/2010			
															3/8/2010			
															1/21/2010			

CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)

(Part III.B.6.) Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

"Operation and Maintenance Program" (a.k.a. "Pollution Prevention/Good Housekeeping Program"): Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

[1] BMP #	Part III.A.1.a. [2] Permit Requirement	Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.e. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.b. [7] Legal Authority to Implement?	[8] City Depts./Facilities (Division) with significant involvement	Part III.A.1.d. [9] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [10] Agreement Needed?	Part III.A.1.c. [11] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [12] Rationale for Measurable Goal(s) Selection	Part III.B.6.f. [13] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [14] Information for Responsible Position(s) to Maintain for Audits	Revised
34	Procedures for the proper disposal of waste removed from:	Municipal operations	Proper disposal of street sweepings	The City identifies that street sweeping is a municipal operation in which waste is removed and requires procedures for proper disposal. Street sweepings are considered by Ohio EPA to be "solid wastes". Therefore, proper disposal of street sweepings is crucial to meeting permit requirements and expectations of Ohio EPA. The City of Canton takes street sweepings to a local waste transfer station for proper disposal.	Required per Part III.B.6.d.iii.3.	Yes	Street	Street: Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and (2) continue to dispose of wastes resulting from street sweeping as described until further notice requires other procedures	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and (2) indication if street sweepings are properly disposed of in accordance with EPA solid waste requirements; and summary of waste disposed	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and (2) supporting documentation, as applicable	3/15/2010
35		The MS4 (including dredge spoil, accumulated sediments, floatables, and other debris)	Proper disposal of MS4 wastes	The City identifies that typical waste removed from the MS4 results from practices such as storm line cleaning (including catch basins and manholes) and roadside ditching. Material removed from storm line cleaning is considered by EPA to be "solid waste". Therefore, proper disposal such material is crucial to meeting permit requirements and expectations of Ohio EPA. The City temporarily places materials from storm line cleaning on a dewatering slab that drains to sanitary sewer. After dewatering, the remaining waste is then taken to a landfill. Material removed from roadside ditching typically consists of accumulated sediments (assuming no street sweepings or trash are mixed in), and are not considered by EPA to be solid waste. Sometimes this materials is disposed on sight if conditions are favorable such that the material will not wash back into the ditch. In other cases it is taken to a fill location.	Required per Part III.B.6.d.iii.3.	Yes	Collection Systems (Sewer)	Collection Systems (Sewer): Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and (2) continue to dispose of wastes removed from the MS4 as described until further notice requires other procedures	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and (2) indication if MS4 wastes are properly disposed of as described; and summary of waste disposed	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and (2) supporting documentation, as applicable	1/21/2010
36	Procedures to ensure that new flood management projects are assessed for impacts on water quality and current projects are assessed for incorporation of additional water quality protection devices or practices	Water quality considerations for flood management projects	Any public "flood management projects" that occur in the City of Canton are coordinated through the City Engineering Department. In cooperation with NPDES storm water permitting requirements, qualifying land disturbances (including flood management projects) of one acre or more in the City are assessed for proper water quality practices (See MCM #4 and MCM #5). The Engineering Department has staff that are trained in storm water quantity and quality management. Water quality practices are therefore ensured to be incorporated into all applicable new and redevelopment projects. The incorporation of water quality protection devices or practices on current sites/projects are to be evaluated on a case-by-case basis.	Required per Part III.B.6.d.iii.4.	"Ordinances for Post-Construction Runoff" (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment)	Yes	Engineering	Engineering: City Engineer	No	Continue to implement required procedures as necessary; and identify any applicable new or current flood management projects in which water quality impacts are assessed for water quality protection devices or practices	Stated goal demands indication if BMP implementation is in accordance with permit expectations	Summary of any applicable new or current flood management projects in which water quality impacts are assessed for water quality protection devices or practices	Supporting documentation, as applicable	1/21/2010